

EXHIBIT 6

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF
COLORED PEOPLE,
SPRING VALLEY BRANCH, et al.,

Plaintiffs,

vs. No.

7:17-cv-08943

EAST RAMAPO CENTRAL
SCHOOL DISTRICT, et al.,
Defendants.

----- X -----

February 7, 2018

12:05 p.m.

Deposition of CHEVON DOS REIS,
held at the offices of Morgan, Lewis &
Bockius LLP, 101 Park Avenue, New York,
New York, pursuant to Notice, before
Theresa Tramondo, AOS, CLR, a Notary
Public of the State of New York.

Reported by:

THERESA TRAMONDO, AOS, CLR

JOB NO. PA2808168A

<p>1 2 APPEARANCE OF COUNSEL: 3 FOR PLAINTIFFS: 4 LATHAM & WATKINS LLP 5 885 Third Avenue 6 New York, New York 10022-4834 7 BY: THOMAS C. PEARCE, ESQ. 8 COREY A. CALABRESE, ESQ. 9 ANDREJ NOVAKOVSKI, LAW CLERK 10 Thomas.pearce@lw.com 11 Corey.calabrese@lw.com 12 Andrej.novakovski@lw.com 13 212-906-1200 14 FOR DEFENDANT EAST RAMAPO CENTRAL SCHOOL 15 DISTRICT: 16 MORGAN, LEWIS & BOCKIUS LLP 17 1111 Pennsylvania Avenue, NW 18 Washington, D.C. 20004-2541 19 BY: RANDALL M. LEVINE, ESQ. 20 DAVID J. BUTLER, ESQ. 21 ADAM ADLER, ESQ. 22 Randall.levine@morganlewis.com 23 David.butler@morganlewis.com 24 Adam.adler@morganlewis.com 25 202-373-6541</p>	Page 2	<p>1 2 3 STIPULATIONS 4 5 6 IT IS HEREBY STIPULATED AND AGREED, 7 by and among counsel for the respective 8 parties hereto, that the filing, 9 sealing and certification of the within 10 deposition shall be and the same are 11 hereby waived; 12 IT IS FURTHER STIPULATED AND AGREED 13 that all objections, except as to form 14 of the question, shall be reserved to 15 the time of the trial; 16 IT IS FURTHER STIPULATED AND AGREED 17 that the within deposition may be signed 18 before any Notary Public with the same 19 force and effect as if signed and sworn to 20 before the Court. 21 22 23 24 25</p>
<p>1 2 APPEARANCE OF COUNSEL (CONT'D): 3 4 FOR DEFENDANT COMMISSIONER MARYELLEN ELIA: 5 STATE OF NEW YORK OFFICE OF THE 6 ATTORNEY GENERAL ERIC T. SCHNEIDERMAN 7 120 Broadway 8 New York, New York 10271-0332 9 BY: ELYCE MATTHEWS, ESQ. 10 Elyce.matthews@ag.ny.gov 11 212-416-8965 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	Page 3	<p>1 2 BY THE COURT REPORTER: 3 Q. Please state your full name for 4 the record. 5 A. Chevon Dos Reis, C-H-E-V-O-N, 6 D-O-S, R-E-I-S. 7 Q. What is your address? 8 A. Home, 64 South Main Street, 9 Apartment 2D, Spring Valley, New York, New 10 York 10977. 11 C H E V O N D O S R E I S, called as a 12 witness, having been duly sworn by a 13 Notary Public, was examined and testified 14 as follows: 15 EXAMINATION BY 16 MR. LEVINE: 17 Q. We are on the record. Good 18 afternoon, Ms. Dos Reis. My name is Randall 19 Levine. I'm an attorney for the East Ramapo 20 Central School District. 21 Could you state your full name 22 for the record, please? 23 A. Chevon Dos Reis. 24 Q. What is your address? 25 A. 64 South Main Street, Apartment</p>

<p style="text-align: right;">Page 6</p> <p>1 Dos Reis 2 2D, Spring Valley, New York 10977. 3 Q. Thank you. 4 Do you understand that you're 5 here today to give testimony for a case 6 called NAACP versus East Ramapo Central 7 School District? 8 A. Yes. 9 Q. Are you represented by counsel 10 today? 11 A. Yes. 12 Q. And is that your lawyer sitting 13 next to you? 14 A. Yes. 15 Q. Have you ever been deposed 16 before? 17 A. Yes. 18 Q. You have. 19 When was the last time you were 20 deposed? 21 A. Early last year. April, I 22 believe, of 2017. 23 Q. What was that case about? 24 A. An incident involving my mom 25 taking a fall.</p>	<p style="text-align: right;">Page 8</p> <p>1 Dos Reis 2 read on the transcript. Understand? 3 A. Yes. 4 Q. There may be times today when 5 your counsel will object to one of my 6 questions. If that happens, that's not an 7 instruction to you not to answer the 8 question. Do you understand? 9 A. Yes. 10 Q. So if you understand my 11 question, even if there is an objection, you 12 should still answer. All right? 13 A. Yes. 14 Q. When you answer questions, 15 you're already doing a good job, but I need 16 you to answer verbally with a yes or a no or 17 some other statement, but no head shakes or 18 shoulder shrugs or other things that don't 19 show up on paper. Understand? 20 A. Yes. 21 Q. If I ask you a question and you 22 don't understand the question, just let me 23 know, I will try to rephrase it as best I 24 can. If you don't ask me to rephrase it, 25 then I will assume that you understood me.</p>
<p style="text-align: right;">Page 7</p> <p>1 Dos Reis 2 Q. Had you ever been deposed before 3 that? 4 A. No. 5 Q. All right. Since you've been 6 through this before, we will just quickly go 7 over the ground rules. 8 Your answers will be given under 9 oath today subject to the penalty of perjury 10 just as you were testifying in a courtroom. 11 Do you understand? 12 A. Yes. 13 Q. I'm going to ask you a series of 14 questions, and your job today is to answer 15 as truthfully and fully as you can manage to 16 the very best of your recollection. Do you 17 understand? 18 A. Yes. 19 Q. For the sake of the court 20 reporter, it's much easier if we don't talk 21 over each other. So I will do my very best 22 to ask you one complete question and stop 23 talking, which is not easy for me, and if 24 you wait for me to stop talking and then 25 answer, everything will be much easier to</p>	<p style="text-align: right;">Page 9</p> <p>1 Dos Reis 2 Okay? 3 A. Yes. 4 Q. If at any point you need to take 5 a break, just ask. 6 A. Okay. 7 Q. All I will ask of you in return 8 is that if I have a question pending, answer 9 the question, and then we will take the 10 break. Okay? 11 A. Yes. 12 Q. Having gone through the 13 preliminaries, let's get through a few more 14 intro pieces. Did you do anything today to 15 prepare for this deposition? 16 A. No. 17 Q. Did you review any documents 18 before you came here today? 19 A. No. 20 Q. Did you -- without telling me 21 anything about what you may have discussed 22 with your attorneys, did you meet with your 23 attorneys before coming today to prepare for 24 your deposition? 25 MR. PEARCE: If I can just</p>

<p>1 Dos Reis 2 for your election? 3 A. Our platform was to bring 4 positive change to the East Ramapo Central 5 School District. We wanted to bring 6 better -- to bring services that we had 7 lost. We wanted to ensure that any and all 8 funds were appropriately disbursed 9 throughout the East Ramapo School District 10 so that things such as infrastructure would 11 be appropriately worked out. We wanted to 12 bring transparency to the board, that was 13 big for us, transparency, trust between the 14 board and the East Ramapo School District 15 parents, students, teachers, administrators, 16 and we wanted to try and mend the 17 relationship or make the relationship 18 stronger between both the public and the 19 private sector. 20 Q. What do you mean when you say 21 "the public and the private sector"? 22 A. Public school parents and 23 private school parents. 24 Q. What do you mean by "public 25 school parents"?</p>	Page 14	<p>1 Dos Reis 2 whose first language isn't English. 3 Q. ESL teachers? 4 A. Right, yes. 5 Q. How many ESL teachers, do you 6 think? 7 MR. PEARCE: Objection. 8 A. Not -- I don't have a specific 9 number. Just whatever the school district 10 needs. 11 Q. Anything else? 12 A. As far as services, those were 13 our top priority. 14 Q. Turning to your declaration, 15 take a look at it, and take a look at 16 paragraph 18. In the second sentence of 17 paragraph 18, just so everybody can follow 18 along, I'll read it, you said, "I ran 19 because I believed that as a board member I 20 could ensure access to a proper education 21 for my children and all of the children 22 attending public schools in the district." 23 Is there anything else besides 24 what you just told me that you think you 25 would have wanted to do as a board member to</p>	Page 16
<p>1 Dos Reis 2 A. Children who attend public 3 schools, and the children who attend private 4 schools. 5 Q. So you mean the parents of 6 children who attend public schools and the 7 parents of children who attend private 8 schools, right? 9 A. Yes. We wanted to work on 10 bringing both together so that when we're 11 discussing budget funds that need to be 12 allocated that both parents and 13 administrators from the -- who attend 14 private schools and public schools would be 15 able to come to the table together to 16 discuss what's needed in both. 17 Q. What services did you want to 18 see returned to the school district 19 specifically? 20 A. Specifically social workers. 21 Q. Anything else? 22 A. Guidance counselors. 23 Q. Anything else? 24 A. Not special ed, but teachers who 25 could help the children whose language --</p>	Page 15	<p>1 Dos Reis 2 ensure access to a proper education for all 3 of the children attending public schools in 4 the district? 5 A. Yes. As I stated before, 6 bringing transparency as a board member, 7 being able to communicate to parents and 8 students exactly what is happening, what 9 decisions are being made once they're made 10 and why and asking the parents and students 11 and administrators what they feel they need 12 in the schools to better -- so that they 13 have better access to academic success and 14 doing things like that. 15 Q. Anything else? 16 A. There are so many things. The 17 top priorities, like I said, were services, 18 transparency, communication with students, 19 parents, teachers, administrators and the 20 board. There are so many things. 21 Q. Were you interested in 22 controlling costs for public education? 23 A. Controlling costs? 24 Q. Um-hum. 25 A. Not necessarily controlling</p>	Page 17

<p>1 Dos Reis 2 costs, but making sure that funds that the 3 school district receives are appropriately 4 and fairly distributed.</p> <p>5 Q. Does that mean that you think 6 that funds are not being fairly and 7 appropriately distributed now?</p> <p>8 A. Based upon layoffs of teachers 9 and the infrastructure of our buildings, no, 10 I do not.</p> <p>11 Q. What's inappropriate about the 12 way funds are being distributed now?</p> <p>13 A. I don't know exactly where the 14 funds are going. For a long time we didn't 15 know where the funds were being distributed.</p> <p>16 Q. When you say "funds," what do 17 you mean?</p> <p>18 A. As to -- you know, the state 19 gives East Ramapo a certain amount of money. 20 We get money from different places. And we 21 have buildings falling apart. We had lead 22 in the water for years, and they just found 23 out last year that the water was not 24 drinkable, yet the children had been 25 drinking it for years.</p>	Page 18	Page 20
<p>1 Dos Reis 2 And so if we have funds for 3 infrastructure for schools and what have 4 you, why did it take years for them to find 5 out that the water was contaminated, why do 6 we have stairs falling apart, why do we have 7 wires hanging out from the ceiling, why 8 don't we have heat in some of the classes, 9 why don't we have air-conditioning in some 10 of the classrooms.</p> <p>11 Q. Those are all very good 12 questions. What is your answer to those 13 questions?</p> <p>14 A. We don't know.</p> <p>15 MR. PEARCE: Objection.</p> <p>16 A. We don't know.</p> <p>17 Q. Do you think funds that the 18 school district has are being misspent?</p> <p>19 A. I don't know.</p> <p>20 Q. Do you think that the money the 21 school district has is being spent on, for 22 example, services to students attending 23 private schools?</p> <p>24 A. I don't know.</p> <p>25 Q. Do you think the school district</p>	Page 19	Page 21

<p style="text-align: right;">Page 22</p> <p>1 Dos Reis 2 A. We were trying to get 3 information out to the community that it was 4 important to come out and vote for school 5 board elections even if you don't have 6 children in schools. Unfortunately, most 7 people think that school board elections are 8 only for those who actually have children in 9 the schools. 10 And so what we did was, you 11 know, if a school district is not meeting 12 its standards and if it's considered -- 13 which our school district unfortunately has 14 been for quite some time now (sic), it's 15 considered a low performing school district, 16 then the property taxes are affected by that 17 in the sense that people are not going to 18 move there. 19 So we were trying to get people 20 to understand that even though you don't 21 have children in the school, it's still 22 important to come out and vote based upon, 23 you know, having a home, wanting people to 24 continue to move into the district because 25 it has a flourishing school district. If</p>	<p style="text-align: right;">Page 24</p> <p>1 Dos Reis 2 A. No. 3 Q. Were you in favor of reducing 4 property tax rates? 5 A. No. That wasn't -- like I said, 6 that wasn't the concern necessarily, like 7 what you're saying, increasing or 8 decreasing. It was just a matter of getting 9 people to -- meeting them where they were 10 and getting them to realize how important it 11 was to come out and vote in a school 12 election. 13 Q. Looking back at your declaration 14 again at paragraph 18, the same sentence, 15 when you say that you ran so that you 16 could -- and just to read along -- "ensure 17 access to a proper education for my children 18 and all of the children attending public 19 schools in the district," you don't say 20 anything about students attending private 21 schools in the district. Why is that? 22 A. In this particular sentence, I 23 didn't mention private schools; however, I 24 do talk later about acquiring academic 25 success for all of the students in the</p>
<p style="text-align: right;">Page 23</p> <p>1 Dos Reis 2 you want to sell your home, you want to be 3 able to get your value for the home. 4 Q. When you say you were trying to 5 get people to understand that, what people 6 specifically? 7 A. Well, we campaigned throughout 8 East Ramapo. 9 Q. Are there any specific people 10 that you spoke to about property taxes 11 during your campaign? 12 A. Specific people? We went in to 13 various towns, just knocked on doors. We 14 went to specific -- the only specific -- the 15 only thing specific about the doors we 16 knocked on was that we knew that they were 17 voters, they were registered voters in East 18 Ramapo. 19 Q. When you knocked on people's 20 doors, sometimes you would talk about 21 property taxes; is that fair? 22 A. Yes. 23 Q. Was your position as you were 24 campaigning in favor of increasing property 25 tax rates?</p>	<p style="text-align: right;">Page 25</p> <p>1 Dos Reis 2 district. 3 Q. So is it your position that as a 4 member of the board of education it's part 5 of the responsibility of board members to be 6 concerned about education of both public and 7 private school students? 8 A. Absolutely. 9 Q. Do you believe that education 10 services should be provided to students 11 attending private schools? 12 A. Yes. 13 Q. Do you know how many private 14 school students there are in East Ramapo? 15 A. About 33,000. 16 Q. Do you know how many public 17 school students there are in East Ramapo? 18 A. Almost 9,000. 19 Q. If I use the term "universal 20 busing," do you know what that is? 21 A. Yes. 22 Q. What is universal busing? 23 A. Universal busing is the fact 24 that you're not restricted when it comes to 25 dropping off and picking up your child from</p>

<p style="text-align: right;">Page 26</p> <p>1 Dos Reis 2 one location to the other. Universal busing 3 is that if you have your child at an 4 after-school program that's outside the 5 child's school district that they could 6 still be bused there. 7 Q. Do you know whether the East 8 Ramapo School District currently has a 9 universal busing policy? 10 A. Yes, it does. 11 Q. As a candidate, did you ever 12 take a position on whether East Ramapo 13 should maintain its universal busing policy? 14 A. During the campaign, I don't 15 believe we brought that up. 16 Q. Earlier you mentioned in your 17 testimony, correct me if I'm not 18 paraphrasing correctly, that you were 19 interested in trying to bring together 20 parents of -- public school parents and 21 private school parents; is that a fair 22 summary? 23 A. Yes. 24 Q. Does that mean that you think 25 that there is a divide between public school </p>	<p style="text-align: right;">Page 28</p> <p>1 Dos Reis 2 and Hasidic Jews that live in East Ramapo? 3 A. They are part of the private 4 school community. 5 Q. Who is else part of the private 6 school community? 7 A. Parents who send their children 8 to Catholic schools. 9 Q. Anybody else? 10 A. No, I only know of those two. 11 Q. Do you have a sense for how many 12 people there are in the private school 13 community? 14 A. Yes. I believe there are 33,000 15 or somewhere around there that are private 16 school students. 17 Q. Right. Total, how many people 18 total are in that community? 19 A. No. 20 Q. More than 33,000, right? 21 A. Well, the students are roughly 22 33,000, so there would be obviously more 23 private school community members if you're 24 incorporating everyone, yes. 25 Q. In the same paragraph, paragraph </p>
<p style="text-align: right;">Page 27</p> <p>1 Dos Reis 2 parents and private school parents? 3 A. I don't know if there is 4 necessarily a divide, but there isn't a lot 5 of communication. 6 Q. Why do you think that is? 7 MR. PEARCE: Objection. 8 A. I don't know. 9 Q. There are a few instances in 10 your declaration where you use a phrase 11 "private school community"; does that sound 12 familiar? 13 A. Yes. 14 Q. So one example is in paragraph 15 21, just if you wanted a specific example, 16 towards the bottom of the paragraph. 17 A. Um-hum. 18 Q. What do you mean when you say 19 "private school community"?</p> <p>20 A. The private school community? 21 Q. Um-hum. 22 A. I'm speaking about those who 23 send their children to private schools. 24 Q. When you say "the private school 25 community," are you referring to Orthodox </p>	<p style="text-align: right;">Page 29</p> <p>1 Dos Reis 2 21, the phrase that you use is the "White 3 private school community." What do you mean 4 by that? 5 A. All right. So this particular 6 paragraph is about a meeting that myself and 7 the other two candidates were invited to at 8 the Green Meadow Waldorf School in Chestnut 9 Ridge. The meeting was facilitated by two, 10 I want to say, Hasidic, and I say "that I'm 11 not sure" because I want to say one lady 12 might be Orthodox and the other lady was 13 definitely from the Hasidic community, and 14 they facilitated a meeting with myself and 15 the other two candidates to speak to other 16 members of the Hasidic community. 17 And this was something they 18 wanted to do, the two ladies, because they 19 said that they felt there was a divide 20 between the Hasidic community and, I guess, 21 those of us of the secular community, and 22 they wanted us to be able to come together 23 and speak at this particular location. 24 And when I said that, however, 25 almost no one from the White private school </p>

<p style="text-align: right;">Page 30</p> <p>1 Dos Reis 2 community attended the event, I'm speaking 3 to those who were invited, and the only 4 other people who were invited, aside from 5 myself and the other two candidates, and 6 whoever we wanted to bring, were from the 7 Hasidic community. That was for this 8 particular event.</p> <p>9 Q. I certainly want to talk about 10 this, and I have some questions about it.</p> <p>11 A. Okay.</p> <p>12 Q. In this paragraph, when you use 13 the phrase, "White private school 14 community," specifically you're referring to 15 members of Hasidic community?</p> <p>16 A. In this case, yes.</p> <p>17 Q. In this paragraph, okay.</p> <p>18 So in paragraph 21, when you use 19 the phrase, "White private school 20 community," that means the Hasidic 21 community, right?</p> <p>22 A. Yes.</p> <p>23 Q. Who invited you to the events at 24 the Green Meadow Waldorf School?</p> <p>25 A. It was two women.</p>	<p style="text-align: right;">Page 32</p> <p>1 Dos Reis 2 people to able to reach out to us. 3 Q. Do you still have that e-mail? 4 A. What e-mail? You mean the 5 specific e-mail or e-mail address? 6 Q. Both. 7 A. Yes. 8 Q. So you still maintain that 9 e-mail account, right? 10 A. Yes. 11 Q. And you still have that specific 12 e-mail where Ms. Shani and Ms. Kressel 13 e-mailed you? 14 A. They e-mailed the group, yes. 15 Q. In that e-mail they invited you 16 and the other candidates to attend an event 17 at the Green Meadow Waldorf School, right? 18 A. Yes. 19 Q. Were there any other 20 communications you had with them? 21 A. Aside from e-mail, no. E-mail. 22 Q. Had you ever met them before? 23 A. No, not prior to the candidacy, 24 the campaign. 25 Q. Did you attend the event?</p>
<p style="text-align: right;">Page 31</p> <p>1 Dos Reis 2 Q. Do you remember their names? 3 A. Yes. Shani, S-H-A-N-I, and 4 Kressel, K-R-E-S-S-E-L. I don't remember 5 their last names. 6 Q. Those are first names? 7 A. Yes. 8 Q. If I say Ms. Shani and 9 Ms. Kressel? 10 A. That's fine. 11 Q. All right. 12 How do you know them? 13 A. They approached our slate, 14 myself, Eric and Allie and Strong East 15 Ramapo. 16 Q. So they reached out to you? 17 A. Yes. 18 Q. Did they call you? 19 A. I know that we had some e-mails 20 that went back and forth. 21 Q. Who e-mailed you? 22 A. Miss Shani and Miss Kressel 23 e-mailed Strong East Ramapo. As we were 24 running, we had an e-mail and a website and 25 a Facebook page that we put out there for</p>	<p style="text-align: right;">Page 33</p> <p>1 Dos Reis 2 A. Yes. 3 Q. What happened? 4 A. Well, myself and the other two 5 candidates were there, Ms. Kressel, 6 Ms. Shani, and there were a few, just a few, 7 maybe three or four other parents that came, 8 and I believe they were all from the Waldorf 9 School community. And that while we were 10 there, we just, you know, decided -- we let 11 Ms. Shani and Ms. Kressel facilitate it. We 12 were sad and disappointed that the people 13 that Ms. Kressel and Ms. Shani wanted to be 14 there didn't show. 15 Q. How many people in total were 16 there? 17 A. Maybe ten. 18 Q. Three or four, when you say, 19 were parents from the Waldorf community, so 20 you mean they were not from the Hasidic 21 community? 22 A. No. 23 Q. And Shani and Kressel were 24 there, right? 25 A. Um-hum.</p>

<p>1 Dos Reis 2 Q. And you were there? 3 A. Um-hum. 4 Q. Were the other two folks that 5 you ran with for the board there as well? 6 A. Yes. 7 Q. Was there anyone else there? 8 A. Yes. There was one other lady 9 there. There was one other lady there. 10 Q. Do you remember who that was? 11 A. No. 12 Q. Was she from the Hasidic 13 community? 14 A. No. 15 Q. Besides Ms. Shani and 16 Ms. Kressel, was there anybody there from 17 the Orthodox or Hasidic Jewish communities? 18 A. No. 19 Q. So when you say in paragraph 21, 20 "Almost no one from the White private school 21 community attended the event," what you mean 22 is that only Shani and Kressel from the 23 Orthodox and Hasidic Jewish community came 24 to the event, right? 25 MR. PEARCE: Objection.</p>	Page 34	<p>1 Dos Reis 2 A. Yes. 3 Q. Do you know whether they, in 4 fact, handed out the campaign literature? 5 A. Yes. 6 Q. They did? 7 A. Yes. 8 Q. What do you mean by 9 "predominantly White neighborhoods"? 10 A. They went into the neighborhoods 11 where they knew specifically private school 12 parents live. 13 Q. Do you know what neighborhoods? 14 A. Ms. Kressel was going into 15 Monsey and Kaser, I want to say, and 16 Ms. Shani wanted to speak with the parents 17 from Wesley Hills, and I'm not sure what 18 other areas she tackled. I know for sure 19 Wesley Hills. 20 Q. So is it fair to say when you 21 say "predominantly White neighborhoods," you 22 mean Orthodox and Hasidic Jewish 23 neighborhoods? 24 MR. PEARCE: Objection. 25 A. Not necessarily, but yes, it</p>	Page 36
<p>1 Dos Reis 2 A. Yeah, I was going to say, I mean 3 that I know of that they identified 4 themselves as White, so it's White. 5 Q. I'm just trying to understand if 6 in this paragraph "the White private school 7 community" refers to the Hasidic community, 8 and almost no one from the Hasidic community 9 attended the event, how many people is 10 "almost no one"? 11 A. Only Ms. Kressel and Ms. Shani 12 were there. 13 Q. So they were the only people 14 from the Orthodox or Hasidic Jewish 15 community, right? 16 A. Yes. 17 Q. You also say in paragraph 21 18 that "two people offered to hand out 19 campaign literature in predominantly White 20 neighborhoods." So are the two people you 21 refer to in that sentence Ms. Kressel and 22 Ms. Shani? 23 A. Yes. 24 Q. Did you give them campaign 25 literature to hand out?</p>	Page 35	<p>1 Dos Reis 2 would include them. 3 Q. Is Monsey a primarily Jewish 4 neighborhood? 5 MR. PEARCE: Objection. 6 If you know. 7 A. Monsey is diverse. 8 Q. What about Kaser, do you know 9 whether Kaser is a primarily Jewish 10 neighborhood? 11 A. I don't know. 12 Q. What about Wesley Hills? 13 A. I don't know. 14 Q. You don't know anything about 15 who lives in Wesley Hills? 16 MR. PEARCE: Objection. 17 A. I don't know what the makeup is 18 exactly. 19 Q. Do you know anything about the 20 people that live in the Kaser neighborhood? 21 A. No. 22 Q. Nothing at all? 23 A. I know that private school 24 parents live there, but I don't know 25 anything of --</p>	Page 37

<p>1 Dos Reis</p> <p>2 Q. How do you know that private</p> <p>3 school parents live there?</p> <p>4 A. Because Ms. Kressel told me.</p> <p>5 Q. In paragraph 21 you say "I did</p> <p>6 not campaign personally in these</p> <p>7 predominantly White areas because as a</p> <p>8 Latina I did not feel welcome there"?</p> <p>9 A. That is correct.</p> <p>10 Q. Why didn't you feel welcome</p> <p>11 there if you don't know anything about the</p> <p>12 people that lived there?</p> <p>13 A. I didn't feel welcome in those</p> <p>14 particular areas because when Ms. Kressel</p> <p>15 and Ms. Shani invited people from -- who</p> <p>16 live in those particular areas, and they</p> <p>17 didn't come, that was a red flag.</p> <p>18 When the community leaders from</p> <p>19 Martin Luther King Center and from the NAACP</p> <p>20 invited people who live in these particular</p> <p>21 communities and they refused to come, I said</p> <p>22 to myself, you know what, clearly people who</p> <p>23 live in these particular areas who have been</p> <p>24 invited to different forums don't want to</p> <p>25 come, then maybe we're not welcome, and I</p>	Page 38	<p>1 Dos Reis</p> <p>2 Square. They're very closed off, very</p> <p>3 private. That's all I know, is that they're</p> <p>4 very private.</p> <p>5 Q. Are the people who live in New</p> <p>6 Square Orthodox Jews?</p> <p>7 A. I do understand that there is a</p> <p>8 Jewish community there. I don't know if</p> <p>9 they're Orthodox or Hasidic. I don't know</p> <p>10 what the sect is.</p> <p>11 Q. Did you feel uncomfortable going</p> <p>12 to New Square?</p> <p>13 A. Once the invitations were</p> <p>14 declined or just flat out ignored and</p> <p>15 Ms. Kressel felt that she and Ms. Shani</p> <p>16 would be better received, yeah, it added to</p> <p>17 already the feeling of not being welcome.</p> <p>18 Q. When you say the invitation, you</p> <p>19 mean the invitation to the events that</p> <p>20 Ms. Shani and Ms. Kressel invited you to?</p> <p>21 A. That event and others.</p> <p>22 Q. Do you know how many people were</p> <p>23 invited to that event?</p> <p>24 A. A lot.</p> <p>25 Q. How many people?</p>	Page 40
<p>1 Dos Reis</p> <p>2 just wanted to stay away, aside from --</p> <p>3 that's really what it was.</p> <p>4 Q. Did Ms. Shani or Ms. Kressel</p> <p>5 tell you that you wouldn't be welcome in</p> <p>6 their neighborhoods?</p> <p>7 A. When we were discussing</p> <p>8 campaigning, I wanted to go -- I was willing</p> <p>9 to take a chance and go to New Square and</p> <p>10 Monsey, and Ms. Kressel did say that she</p> <p>11 thought that she and Ms. Shani would be</p> <p>12 better received in those particular</p> <p>13 communities. She did think that they would</p> <p>14 be better received.</p> <p>15 Q. Did she tell you why she thought</p> <p>16 that?</p> <p>17 A. No.</p> <p>18 Q. Do you have any idea --</p> <p>19 MR. PEARCE: Objection.</p> <p>20 Q. -- why that might be the case?</p> <p>21 A. No.</p> <p>22 Q. What do you know about -- if</p> <p>23 anything, what do you know about the people</p> <p>24 who live in New Square?</p> <p>25 A. I don't know much about New</p>	Page 39	<p>1 Dos Reis</p> <p>2 A. I don't know exactly how many.</p> <p>3 Q. How do you know that a lot of</p> <p>4 people were invited?</p> <p>5 A. Because the e-mail that was</p> <p>6 sent, when you look at the list of people it</p> <p>7 was sent to, there were at least a hundred</p> <p>8 names, at least, and that was community</p> <p>9 leaders, that included community leaders,</p> <p>10 and they were also asked to then spread the</p> <p>11 word within their communities, and so a lot</p> <p>12 of people were invited.</p> <p>13 Q. What do you mean by "community</p> <p>14 leaders"?</p> <p>15 A. Community leaders, we asked --</p> <p>16 we asked -- that I understand, Ms. Kressel</p> <p>17 and Ms. Shani invited people from the</p> <p>18 private school community that they knew</p> <p>19 spearheaded, I guess, different types of</p> <p>20 organizations like NAACP on our side or MLK,</p> <p>21 organizations that they were familiar with.</p> <p>22 Those community leaders were invited and</p> <p>23 other people. Ms. Kressel and Ms. Shani</p> <p>24 know a lot of people. And in the e-mails</p> <p>25 that were sent back and forth inviting</p>	Page 41

<p>1 Dos Reis 2 individuals to, let's say, this particular 3 event, it was quite a list. 4 Q. Do you still have that e-mail 5 with the invitation? 6 A. Yes. 7 Q. How many people did you invite 8 to the meeting? 9 A. I didn't invite anyone 10 specifically because the two ladies were 11 facilitating the event, so... 12 Q. You said that three or four 13 people from the Waldorf community came? 14 A. Uh-hum. 15 Q. Who invited them? 16 A. Yes. I would assume 17 Ms. Shani -- I believe Ms. Shani and 18 Ms. Kressel. Like I said, they were the two 19 who facilitated the event. 20 Q. So no one on your slate, on your 21 side of the slate invited anyone to attend 22 this? 23 MR. PEARCE: Objection. 24 A. No. 25 Q. You can answer.</p>	Page 42	<p>1 Dos Reis 2 A. About that it would have been, 3 um-hum. 4 Q. Do you know why the people who 5 were invited didn't attend? 6 MR. PEARCE: Objection. 7 A. No, I don't know. 8 Q. Did you talk about it with 9 Ms. Kressel or Ms. Shani? 10 A. We discussed it in the sense 11 that we all expressed how disappointed we 12 were that no one else came to the event, but 13 that was the extent of it. 14 Q. Were there any communications 15 with Ms. Shani or Ms. Kressel after this 16 meeting? 17 A. Yes, um-hum. 18 Q. Okay. About how many? 19 A. We communicated back and forth 20 maybe three, four times after that. 21 Q. How did you communicate? 22 A. Via e-mail. 23 Q. You still have those e-mails? 24 A. Yes. 25 Q. Just generally, if you recall,</p>	Page 44
<p>1 Dos Reis 2 A. No. 3 Q. What was the date of the event, 4 if you remember? 5 A. I don't remember the date. 6 Q. Do you remember what day of the 7 week it was? 8 A. No. 9 Q. Was it on the weekend? 10 A. It was during the week, but I 11 don't remember the date. 12 Q. Middle of the week sound right? 13 A. I don't remember. 14 Q. Do you remember what month? 15 A. No. It would have been between 16 March -- it would have been either March or 17 April. 18 Q. Do you know what time? 19 A. Evening. 20 Q. Does 5 p.m. sound right? 21 MR. PEARCE: Objection. 22 A. No. 23 Q. 6 p.m.? 24 A. 7. 25 Q. About 7 p.m. sounds right?</p>	Page 43	<p>1 Dos Reis 2 what were you talking about with them? 3 A. Communication after the event 4 was just about how they could continue to 5 help with the campaign. 6 Q. Did they continue to help with 7 the campaign? 8 A. Yes. 9 Q. What did they do? 10 A. They took campaign material and 11 distributed it amongst people that they knew 12 and within neighborhoods that they felt 13 comfortable in door knocking in. 14 Q. What campaign materials did you 15 give them? 16 A. We had flyers with mine and the 17 other two candidates' faces, our names and 18 our platform. 19 Q. Do you still have those? 20 A. Yes. 21 Q. What did it say on the flyer? 22 A. Like I said, our names -- just 23 as much as we could get in the space that we 24 had of our platform and our faces, so that 25 people could put the name to the face.</p>	Page 45

<p>1 Dos Reis</p> <p>2 Q. Do you recall specifically what</p> <p>3 from your platform it said on the flyers?</p> <p>4 A. No.</p> <p>5 Q. Do you recall generally what the</p> <p>6 message was?</p> <p>7 A. We pushed diversity, inclusion</p> <p>8 and transparency.</p> <p>9 Q. Do you think that message of</p> <p>10 diversity, inclusion and transparency is</p> <p>11 something that would be appealing to the</p> <p>12 private school parents?</p> <p>13 MR. PEARCE: Objection.</p> <p>14 A. It was our hope, but I don't</p> <p>15 know.</p> <p>16 Q. Do you have a sense for what the</p> <p>17 private school community's political</p> <p>18 preferences are for the board of education?</p> <p>19 A. No.</p> <p>20 Q. Do you have a sense for what</p> <p>21 kind of education policies the private</p> <p>22 school community supports?</p> <p>23 A. I'm sorry, say that again.</p> <p>24 Q. Yes.</p> <p>25 Do you have a sense for what</p>	Page 46	<p>1 Dos Reis</p> <p>2 non-White?</p> <p>3 A. I don't know the percentage.</p> <p>4 Q. Ballpark?</p> <p>5 MS. CALABRESE: Objection.</p> <p>6 Q. If you want to estimate.</p> <p>7 A. About 80 percent.</p> <p>8 Q. Does that mean that if you had</p> <p>9 to estimate, about 20 percent would be</p> <p>10 White?</p> <p>11 A. I guess if I had to estimate,</p> <p>12 maybe about that.</p> <p>13 Q. Is there a political divide</p> <p>14 between the private school community and the</p> <p>15 public school community?</p> <p>16 A. I don't know.</p> <p>17 Q. Do you think that the private</p> <p>18 school community and the public school</p> <p>19 community want different things for the</p> <p>20 public school district?</p> <p>21 MS. CALABRESE: Objection.</p> <p>22 A. Yeah, I don't know what the</p> <p>23 private school community wants for the</p> <p>24 public school community.</p> <p>25 Q. Did you do anything to try to</p>	Page 48
<p>1 Dos Reis</p> <p>2 kind of policy preferences the private</p> <p>3 school parents support?</p> <p>4 A. No.</p> <p>5 Q. Do you have a sense for the</p> <p>6 private school community's position on</p> <p>7 property taxes?</p> <p>8 A. No.</p> <p>9 Q. Do you have a sense for the</p> <p>10 private school community's position on</p> <p>11 school district busing programs?</p> <p>12 A. No.</p> <p>13 Q. To the best of your knowledge,</p> <p>14 is everyone in the private school community</p> <p>15 White?</p> <p>16 A. I don't know.</p> <p>17 Q. When you say the public school</p> <p>18 community, is everyone in the public school</p> <p>19 community non-White?</p> <p>20 A. No, not everyone.</p> <p>21 Q. Is there a mix of people in the</p> <p>22 public school community?</p> <p>23 A. Yes.</p> <p>24 Q. If you know, about what</p> <p>25 percentage of the public school community is</p>	Page 47	<p>1 Dos Reis</p> <p>2 find out?</p> <p>3 A. Yes.</p> <p>4 Q. What did you do?</p> <p>5 A. Well, when we set up for door</p> <p>6 knocking, we had set up to door knock on as</p> <p>7 many doors as possible of those who are</p> <p>8 registered voters, which would be anyone</p> <p>9 from the private or public school</p> <p>10 communities, but as I said, when Ms. Kressel</p> <p>11 stated as she thought that her and Shani</p> <p>12 would be better received in certain</p> <p>13 communities, specifically where private</p> <p>14 school parents lived, then that's when we</p> <p>15 held off. Initially we wanted to, but then</p> <p>16 we held off.</p> <p>17 Q. By "private school parents" in</p> <p>18 that context, you mean Orthodox and Hasidic</p> <p>19 Jews, right?</p> <p>20 MR. PEARCE: Objection.</p> <p>21 A. Not necessarily. It was just</p> <p>22 anyone from the private school community for</p> <p>23 the most part.</p> <p>24 Q. Is there some reason why you</p> <p>25 think Ms. Kressel or Ms. Shani would be more</p>	Page 49

<p style="text-align: right;">Page 50</p> <p>1 Dos Reis 2 well received by Catholic school parents 3 than you? 4 A. Their concern -- I don't -- 5 their concern wasn't so much with the 6 Catholic school community. 7 Q. So in that context when you 8 refer to the private school community, you 9 mean the Orthodox and Hasidic Jewish 10 community, right? 11 A. Yes. 12 MR. PEARCE: Objection. 13 Q. Thank you. 14 Do you feel uncomfortable 15 talking about the Hasidic and Orthodox 16 Jewish community? 17 A. No. 18 Q. Why do you use the phrase 19 "private school community" instead of 20 referring to the Orthodox and Hasidic Jewish 21 community? 22 A. Because the Orthodox and the 23 Hasidic community aren't the only 24 communities who send their children to 25 private school.</p>	<p style="text-align: right;">Page 52</p> <p>1 Dos Reis 2 MR. PEARCE: Objection. 3 Q. Tell me about your slate. Your 4 slate was called The Power of Ten slate; is 5 that right? 6 A. No. 7 Q. Did your slate have a name? 8 A. No. We were just considered a 9 slate because we were -- when we were 10 collecting signatures, we collected 11 signatures for each other, and also like we 12 went and said, okay, these are the three 13 candidates who are running for school board, 14 and we did it together. That's why it was 15 considered a slate. 16 Q. Is there some formal process you 17 have to go through to be a slate? 18 A. To be a slate, no. We decided 19 to run together; however, there was a 20 process. 21 Q. What is the process? 22 A. To -- how do you say that? 23 To -- like when I -- when I announced my 24 candidacy, I did so at a forum that was put 25 together by Strong East Ramapo and Power of</p>
<p style="text-align: right;">Page 51</p> <p>1 Dos Reis 2 Q. In your mind, what is important 3 is that they send their kids to private 4 school? 5 A. No. 6 (Record read.) 7 Q. In terms of school district 8 politics, what's important is that they send 9 their kids to private school, is that what 10 you mean? 11 MS. CALABRESE: Objection. 12 A. I don't know what you mean. 13 Q. I'm trying to understand, right, 14 because -- what about sending kids to 15 private school is so significant to you? 16 A. Nothing, aside from the fact 17 that we wanted to have better communication 18 between public school parents and private 19 school parents. That's it. 20 Q. Do you think there is not good 21 communication now? 22 A. There's very little that I know 23 of. 24 Q. Why do you think that is? 25 A. I don't know.</p>	<p style="text-align: right;">Page 53</p> <p>1 Dos Reis 2 Ten. 3 Q. Is that part of the slate 4 process? 5 A. No. 6 Q. What is Strong East Ramapo? 7 A. Strong East Ramapo is an 8 organization that came together for -- it's 9 an organization made up of community leaders 10 in East Ramapo who came together to fight 11 for the rights of the students in East 12 Ramapo. 13 Q. About how many -- does Strong 14 East Ramapo have members? 15 A. Currently, yes, we are official 16 this year. 17 Q. About how many members does 18 Strong East Ramapo have? 19 A. Members, I don't know the number 20 right now offhand. I mean, Strong East 21 Ramapo has been official for a couple of 22 years in the sense that they have the 23 Facebook page, they have a following, but I 24 mean, official in the sense that we actually 25 have an executive board started this year.</p>

<p style="text-align: right;">Page 54</p> <p>1 Dos Reis 2 Q. Who is on the executive board? 3 A. Myself, Steven White, Andrew 4 Mandel and Yolanda Leon. 5 Q. Anyone else? 6 A. That is the -- well, we just 7 added Alexandra Manigo. 8 Q. Does a person have to do 9 anything in particular to become a member of 10 Strong East Ramapo? 11 A. A member, no. They just -- they 12 go to the website and ask to become a 13 member. That's it. 14 Q. Would you be able to find out 15 how many members Strong East Ramapo has? 16 A. Well, we have a following on 17 Facebook. We have the numbers on Facebook 18 as to how many members we have on there. 19 Yes, yes, I guess like altogether with our 20 e-mail server and Facebook, yes, we could 21 probably get the exact number. 22 Q. Are all of the members of Strong 23 East Ramapo voters registered in East 24 Ramapo? 25 MR. PEARCE: Objection.</p>	<p style="text-align: right;">Page 56</p> <p>1 Dos Reis 2 sends it out to everyone who has enlisted -- 3 Q. Is Power of Ten an organization? 4 A. -- in Power of Ten. 5 Not an organization, no. 6 Q. Is it like a newsletter? 7 A. Yes, something like that. 8 Q. So when you say "members," do 9 you mean people who like subscribe to Power 10 of Ten? 11 A. Yes. 12 Q. I see. I understand. 13 Did Power of Ten endorse your 14 slate? 15 A. Yeah, I guess you would say so. 16 I don't know if "endorse" is the right word. 17 Q. Did Power of Ten sponsor your 18 slate? 19 A. No, we didn't get any money from 20 Power of Ten, if that's what you mean. 21 Q. Well, was Power of Ten involved 22 at all in your slate's campaign? 23 A. Yes, in the sense of putting 24 information out there as to when we were 25 going to have a forum or debate or -- that's</p>
<p style="text-align: right;">Page 55</p> <p>1 Dos Reis 2 A. No. 3 Q. So you don't have to be an East 4 Ramapo voter to be a member of Strong East 5 Ramapo? 6 A. Correct. 7 Q. What about Power of Ten, what is 8 that? 9 A. Power of Ten is a -- not a 10 database, but Power of Ten is made up of one 11 person who was very active in the community, 12 and any information that he acquires, be it 13 at meetings, forums, what have you, he then 14 puts it in an e-mail blast to anyone who 15 wants to be a member of Power of Ten so that 16 they can get current information of what is 17 going on in East Ramapo. 18 Q. Who is the one person? 19 A. Steven White. 20 Q. Does Power of Ten have members? 21 A. Yes. 22 Q. So Power of Ten is not just one 23 person? 24 A. Well, it's the one person who 25 puts all the information together and then</p>	<p style="text-align: right;">Page 57</p> <p>1 Dos Reis 2 it, just putting out there when we were 3 going to have forums or debates or an event 4 so that, you know whoever would want to come 5 and attend would be able to have that 6 information. 7 Q. Does Power of Ten advocate any 8 particular policy perspective? 9 A. Does Power of Ten have any 10 policy perspective? 11 Q. Yeah. 12 MS. CALABRESE: Objection. 13 Q. Yeah, I can do that better. 14 Does Power of Ten advocate for 15 any particular policies with respect to 16 education in East Ramapo? 17 A. Policy wise, I honestly don't 18 know. I just started following Power of Ten 19 a few years ago, but it has been around much 20 longer. So I don't know exactly. 21 Q. What about Strong East Ramapo? 22 A. Strong East Ramapo doesn't 23 take -- we don't deal with policies. Strong 24 East Ramapo is just about trying to 25 communicate with the board or anyone else</p>

<p style="text-align: right;">Page 58</p> <p>1 Dos Reis 2 involved with education. 3 Q. Does Strong East Ramapo take 4 positions on political issues? 5 A. No. 6 Q. Was Strong East Ramapo involved 7 in any way in your political campaign? 8 A. Yes. 9 Q. How was Strong East Ramapo 10 involved? 11 A. Well, through Strong East Ramapo 12 we had fundraisers and through Strong East 13 Ramapo we were able to obtain information as 14 to who were eligible voters in East Ramapo. 15 That was it. Like just -- you know, just 16 the support in putting on forums and events 17 and so forth. But it was, you know, just so 18 that we were able to get the information out 19 to as many people as possible. 20 Q. What information? 21 A. About, you know, events 22 happening, debates. We just wanted to be 23 able to let everyone in East Ramapo know who 24 was running and when the election was taking 25 place.</p>	<p style="text-align: right;">Page 60</p> <p>1 Dos Reis 2 where my heart was, and what my intentions 3 were if I was to become school board member. 4 Q. What do you think about the 5 current East Ramapo school board? 6 MR. PEARCE: Objection. 7 A. I feel that with the current 8 school board we could use more transparency 9 and better communication. 10 Q. Anything else? 11 A. No. 12 Q. There is nothing else that you 13 would do differently? 14 MR. PEARCE: Objection. 15 A. I don't know. I'm not sitting 16 on the school board yet. 17 Q. When you were campaigning, did 18 you ever say what you would do differently 19 than the school board at that time? 20 A. I didn't compare what I -- what 21 my -- well, I didn't compare what I would 22 like to do with what I felt the school board 23 was doing. I didn't compare, no. 24 MR. LEVINE: Why don't we take 25 a five-minute break.</p>
<p style="text-align: right;">Page 59</p> <p>1 Dos Reis 2 Q. Were there any debates during 3 the campaign? 4 A. Debates were set up. Debates 5 did not happen because our opponents never 6 came. They were invited, but they never 7 came. 8 Q. Did you ever give any speeches 9 where you set out your political views for 10 your campaign? 11 A. Yes. 12 Q. Where did you give speeches? 13 A. I gave my first speech -- well, 14 when I announced my candidacy. Well, when I 15 announced my candidacy, I gave information 16 about myself and I answered questions from 17 the public. 18 Q. Do you know if any of that was 19 ever written down or recorded? 20 A. Officially, I don't know. 21 Q. Anything else along those lines? 22 A. We had a fund-raiser and at the 23 fund-raiser I spoke. 24 Q. What did you say? 25 A. Just where my platform was,</p>	<p style="text-align: right;">Page 61</p> <p>1 Dos Reis 2 (Recess taken.) 3 MR. LEVINE: Could you read back 4 the last question and answer so we can 5 pick up where we left off. 6 (Record read.) 7 Q. If you could take a look at 8 paragraph 21 of your declaration. 9 A. Yes. 10 Q. You say that you were not 11 invited to any candidate forums in the 12 predominantly White communities of the 13 district including New Square, Kaser or 14 Monsey. Do you know if there were any 15 candidate forums in those neighborhoods? 16 A. No, I don't know. 17 Q. So you don't know if there were 18 any candidate forums to which you could have 19 been invited, right? 20 A. Right. 21 Q. How do you know that New Square, 22 Kaser or Monsey are predominantly White 23 communities? 24 A. I mean, I don't really know how 25 to state it, but I guess it's kind of</p>

<p>1 Dos Reis 2 obvious when you drive through. 3 Q. Have you driven through 4 New Square? 5 A. I drive -- I don't know if it's 6 necessarily New Square. New Square is kind 7 of cut off, but I drive on, it's called, 8 Route 45, which New Square is right off of. 9 I drive through there about five times a 10 day. 11 Q. And you know from driving past 12 New Square that's it's a predominantly White 13 community? 14 A. Yeah. I've never seen anyone of 15 color coming in and out of there. 16 Q. How about Kaser, how do you know 17 Kaser is a predominantly White community? 18 A. Kaser is -- it's just about the 19 same thing, just driving through the area 20 and just never seen -- not often seeing a 21 person of color coming in or out. 22 Q. What do you see coming in or 23 out? 24 A. Mostly those from the Hasidic 25 community, people from the Hasidic</p>	Page 62	<p>1 Dos Reis 2 Q. Do you get along with Haitian 3 people? 4 A. Yes. 5 Q. Do you get along with 6 African-American people? 7 A. Yes. 8 Q. Do you get along with Latino 9 people? 10 A. Yes. 11 Q. Do you get along with Jewish 12 people? 13 A. Yes. 14 Q. So you get along? 15 A. For the most part, yes, of 16 course. 17 Q. All right, that's what I'm 18 asking. 19 Take a look at paragraph 23. 20 You say, "I do not know which organizations 21 or community leaders endorsed the slate on 22 which my opponent Joe Freilich ran." 23 So my question is: Do you know 24 whether any organizations or community 25 leaders endorsed your opponent's slate?</p>	Page 64
<p>1 Dos Reis 2 community. 3 Q. Is that the same for Monsey as 4 well? 5 A. In Monsey there is -- Monsey is 6 diverse, it's more diverse. 7 Q. How do you know that? 8 A. Well, because my son's school is 9 in Monsey. I live five blocks from Monsey, 10 so I'm constantly up in the Monsey area, and 11 there you'll see -- as I drive my son to 12 school, you'll see all the kids outside 13 waiting for buses, and it's clearly diverse. 14 Q. When you say "diverse," what are 15 the communities in Monsey that make it 16 diverse? 17 A. Diverse, we have 18 African American, Latino, Haitian, Jewish, 19 White. That's diverse. 20 Q. Does everybody get along? 21 MR. PEARCE: Objection. 22 A. I don't know. 23 Q. I mean, just in your own 24 experience? 25 A. I don't know.</p>	Page 63	<p>1 Dos Reis 2 A. No. 3 Q. So it's possible that no 4 organizations or community leaders endorsed 5 your opponent's slate; you just don't know? 6 A. I don't know. 7 Q. The next sentence you say that 8 you "were never offered an opportunity to 9 compete for a position on that slate or for 10 the endorsement of the community leaders who 11 endorsed my opponent." 12 So the question then is: Do you 13 know if there actually was any competition 14 for your opponent's slate? 15 A. You know what, that part is my 16 fault. I didn't know exactly how to say it. 17 It wasn't so much that I was competing for a 18 position under slate. That was my fault. 19 What I wanted to say was that I would have 20 liked an opportunity to have been heard by 21 those from the private community schools, 22 such as when community leaders from the 23 Martin Luther King Center and NAACP and 24 Strong East Ramapo invited our opponents to 25 forums and, you know, to debates, and they</p>	Page 65

<p style="text-align: right;">Page 66</p> <p>1 Dos Reis 2 didn't come, I just wished that we had had 3 the opportunity to have been heard by both 4 our opponents and parents from the private 5 school community. 6 Q. When you say in the last 7 sentence here that you don't know what 8 criteria those organizations or leaders used 9 to slate or endorse their preferred 10 candidates, you don't know whether there are 11 any such organizations or leaders or 12 criteria; is that right? 13 A. Yes. 14 Q. Maybe there are, maybe there 15 aren't; you just don't know? 16 A. Right, I don't know. 17 Q. So when you say you were never 18 offered an opportunity to compete for a 19 position, what you mean is that you wanted 20 an opportunity to be able to speak to people 21 from this other community; is that fair? 22 A. Yes. 23 Q. Did you give any interviews with 24 the newspaper when you were a candidate? 25 A. Yes.</p>	<p style="text-align: right;">Page 68</p> <p>1 Dos Reis 2 many people came? 3 A. No. 4 Q. More than 20 sound about right? 5 A. Yes. 6 Q. More than 30 sound about right? 7 A. Yes. 8 Q. More than 50 sound about right? 9 A. I don't know. 10 Q. Am I close? 11 A. I really don't know. 12 Q. Under a hundred? 13 A. I don't know. 14 Q. Does the NAACP Spring Valley 15 have members? 16 MR. PEARCE: Objection. 17 A. Does the NAACP have members? 18 Q. Um-hum. 19 A. Yes. 20 Q. How do you know that? 21 A. Well, I've attended events of 22 theirs and they usually pass around 23 applications for membership, so... 24 Q. Are you a member of the NAACP? 25 A. I am. I am. I just haven't</p>
<p style="text-align: right;">Page 67</p> <p>1 Dos Reis 2 Q. Did you state your positions in 3 those news articles? 4 A. In the sense of what our 5 platform was, yes, when our position was 6 about transparency, diversity and inclusion. 7 Q. So in the next paragraph, 8 paragraph 24, you say that you never saw 9 your opponent or other members of the slate 10 campaigning and that they did not attend any 11 candidate forums that you attended; for 12 example, the opponent did not attend the 13 forum held by the NAACP and JAMCCAR. 14 When you say "the NAACP," do you 15 mean the NAACP of Spring Valley? 16 A. Yes. 17 Q. When was the NAACP of Spring 18 Valley forum? 19 A. It would have been in either 20 March or April of 2017. 21 Q. How many people came to the 22 NAACP forum? 23 MR. PEARCE: Objection. 24 A. I don't know exactly. 25 Q. Could you estimate about how</p>	<p style="text-align: right;">Page 69</p> <p>1 Dos Reis 2 officially paid any dues yet. 3 Q. Do you know about how many 4 people are members of the NAACP? 5 A. No, I don't. 6 Q. In paragraph 10 of your 7 declaration, on the very bottom you say, 8 "With the exception of Mr. Germain on one 9 occasion in 2016 and Ms. Charles-Pierre, I 10 am not aware of any current member of the 11 board participating in any of these 12 candidate forums or any other candidate 13 forum in my community." 14 Who are you referring to when 15 you refer to Mr. Germain? 16 A. I'm sorry? 17 Q. Who is Mr. Germain? 18 A. Mr. Germain is one of the school 19 board candidates -- I mean, not candidate. 20 He's one of the school board members. 21 Q. Are you referring to Pierre 22 Germain? 23 A. Yes. 24 Q. And you're aware that he 25 attended a forum in your community in 2016?</p>

<p style="text-align: right;">Page 70</p> <p>1 Dos Reis 2 A. Yes. 3 Q. What forum was that? 4 A. It was a forum being hosted by 5 the NAACP and JAMCCAR. 6 Q. Just for the record, is JAMCCAR 7 the Jamaican Civic and Cultural Association 8 of Rockland? 9 A. Yes. 10 Q. Did you attend that forum? 11 Q. Yes. 12 Q. Did you speak with Mr. Germain? 13 A. We greeted each other. 14 Q. Did Mr. Germain speak at the 15 forum? 16 A. I don't know. I got there late. 17 Q. Does it matter to you that 18 Mr. Germain attended that forum for some 19 reason? 20 A. No. 21 Q. Did you vote for Mr. Germain 22 when he ran? 23 A. When he ran for reelection, no. 24 Q. Did you vote for Mr. Germain 25 when he ran in 2013?</p>	<p style="text-align: right;">Page 72</p> <p>1 Dos Reis 2 A. I don't remember. 3 Q. Do you recall any specific 4 reasons why -- just to use your own words, 5 do you recall any specific reasons why the 6 public school community became disappointed 7 with Mr. Germain? 8 A. So many things happened in the 9 district. I don't remember the details of 10 like exactly what it was that he voted on 11 that disappointed a lot of us from the 12 public school community. I don't remember 13 specifically. 14 Q. Can you explain any reason why 15 the public school community became 16 disappointed in Mr. Germain? 17 MR. PEARCE: Objection. 18 A. Specifically, no. 19 Q. How about generally, can you 20 explain any reason why the public school 21 community became disappointed in Mr. Germain 22 generally? 23 A. No, not -- no. 24 Q. In your understanding, was the 25 public school community disappointed in</p>
<p style="text-align: right;">Page 71</p> <p>1 Dos Reis 2 A. I don't recall. 3 Q. Did you vote in 2013? 4 A. I don't think so. 5 Q. Why didn't you vote for 6 Mr. Germain in his reelection bid? 7 A. I didn't vote for him in his 8 reelection -- I don't believe I did because 9 by then a lot of people from the public 10 school community were disappointed, felt 11 disappointed, and let down by him. 12 Q. Why? 13 A. When it came to decisions that 14 needed to be made, oftentimes Mr. Germain 15 was either not at the board meeting or did 16 not vote in favor of what the public school 17 parents wanted. 18 Q. Do you recall any specific votes 19 that Mr. Germain cast that you disagreed 20 with? 21 A. No, I don't remember. 22 Q. Do you recall any specific 23 issues that the public school parents wanted 24 to go one way and Mr. Germain went the 25 other?</p>	<p style="text-align: right;">Page 73</p> <p>1 Dos Reis 2 Mr. Germain because he voted with the 3 Orthodox and Hasidic Jewish members of the 4 board of education? 5 A. I don't know if it was 6 necessarily with the other board members. 7 Q. As you sit here today, you don't 8 know why you didn't vote for Mr. Germain? 9 MR. PEARCE: Objection. 10 A. I do. I just don't remember 11 specifically what we disagreed on. 12 Q. Do you know who Bernard Charles 13 is? 14 A. Yes. 15 Q. Did you ever vote for Bernard 16 Charles? 17 A. I did not vote for him in his 18 reelection. 19 Q. Did you vote for him the first 20 time that he ran? 21 A. I don't recall. 22 Q. Why didn't you vote for 23 Mr. Charles in his reelection bid? 24 A. For the same reason as 25 Mr. Germain.</p>
<p style="text-align: right;">Page 70</p> <p>1 Dos Reis 2 A. Yes. 3 Q. What forum was that? 4 A. It was a forum being hosted by 5 the NAACP and JAMCCAR. 6 Q. Just for the record, is JAMCCAR 7 the Jamaican Civic and Cultural Association 8 of Rockland? 9 A. Yes. 10 Q. Did you attend that forum? 11 Q. Yes. 12 Q. Did you speak with Mr. Germain? 13 A. We greeted each other. 14 Q. Did Mr. Germain speak at the 15 forum? 16 A. I don't know. I got there late. 17 Q. Does it matter to you that 18 Mr. Germain attended that forum for some 19 reason? 20 A. No. 21 Q. Did you vote for Mr. Germain 22 when he ran? 23 A. When he ran for reelection, no. 24 Q. Did you vote for Mr. Germain 25 when he ran in 2013?</p>	<p style="text-align: right;">Page 72</p> <p>1 Dos Reis 2 A. I don't remember. 3 Q. Do you recall any specific 4 reasons why -- just to use your own words, 5 do you recall any specific reasons why the 6 public school community became disappointed 7 with Mr. Germain? 8 A. So many things happened in the 9 district. I don't remember the details of 10 like exactly what it was that he voted on 11 that disappointed a lot of us from the 12 public school community. I don't remember 13 specifically. 14 Q. Can you explain any reason why 15 the public school community became 16 disappointed in Mr. Germain? 17 MR. PEARCE: Objection. 18 A. Specifically, no. 19 Q. How about generally, can you 20 explain any reason why the public school 21 community became disappointed in Mr. Germain 22 generally? 23 A. No, not -- no. 24 Q. In your understanding, was the 25 public school community disappointed in</p>
<p style="text-align: right;">Page 71</p> <p>1 Dos Reis 2 A. I don't recall. 3 Q. Did you vote in 2013? 4 A. I don't think so. 5 Q. Why didn't you vote for 6 Mr. Germain in his reelection bid? 7 A. I didn't vote for him in his 8 reelection -- I don't believe I did because 9 by then a lot of people from the public 10 school community were disappointed, felt 11 disappointed, and let down by him. 12 Q. Why? 13 A. When it came to decisions that 14 needed to be made, oftentimes Mr. Germain 15 was either not at the board meeting or did 16 not vote in favor of what the public school 17 parents wanted. 18 Q. Do you recall any specific votes 19 that Mr. Germain cast that you disagreed 20 with? 21 A. No, I don't remember. 22 Q. Do you recall any specific 23 issues that the public school parents wanted 24 to go one way and Mr. Germain went the 25 other?</p>	<p style="text-align: right;">Page 73</p> <p>1 Dos Reis 2 Mr. Germain because he voted with the 3 Orthodox and Hasidic Jewish members of the 4 board of education? 5 A. I don't know if it was 6 necessarily with the other board members. 7 Q. As you sit here today, you don't 8 know why you didn't vote for Mr. Germain? 9 MR. PEARCE: Objection. 10 A. I do. I just don't remember 11 specifically what we disagreed on. 12 Q. Do you know who Bernard Charles 13 is? 14 A. Yes. 15 Q. Did you ever vote for Bernard 16 Charles? 17 A. I did not vote for him in his 18 reelection. 19 Q. Did you vote for him the first 20 time that he ran? 21 A. I don't recall. 22 Q. Why didn't you vote for 23 Mr. Charles in his reelection bid? 24 A. For the same reason as 25 Mr. Germain.</p>

<p>1 Dos Reis 2 Q. Is that because the public 3 school community became disappointed in 4 Mr. Charles; is that right? 5 A. Yes, yes. 6 Q. Do you recall any specific 7 reasons why the public school community 8 became disappointed in Mr. Charles? 9 A. No, nothing specific. 10 Q. How about you specifically, are 11 you disappointed in Mr. Charles? 12 A. Yes. 13 Q. Why are you disappointed with 14 Mr. Charles? 15 A. Well, Mr. Charles attends even 16 less school board meetings than Mr. Germain. 17 Mr. Charles is almost never at the board 18 meetings. 19 Q. How do you know that? 20 A. Because I attend -- well, in the 21 last year I attended the school board 22 meetings regularly. 23 Q. In the last year in which you 24 attended the board meetings regularly, 25 Mr. Charles has not attended school board</p>	Page 74	<p>1 Dos Reis 2 Valley? 3 A. Yes, I do see him in Spring 4 Valley. 5 Q. Because he lives in Spring 6 Valley, right? 7 A. Yes. 8 Q. Do you know him? 9 A. Yes and no. 10 Q. Have you ever spoken with him? 11 A. Yeah, briefly, yes. 12 Q. When was that? 13 A. Whenever we see each other in 14 Spring Valley, it's always hello and 15 good-bye because it's just a familiar face. 16 Q. Did you ever talk with him about 17 the school district? 18 A. I never got to speak to him 19 about the school district, but he did 20 approach me about -- he approached me when 21 he learned that I was running for school 22 board. 23 Q. When was that? 24 A. It would have been in March or 25 April again.</p>	Page 76
<p>1 Dos Reis 2 meetings; is that right? 3 A. He has not attended many. 4 Q. About how many? 5 A. Very few. I couldn't tell you 6 exactly how many. 7 Q. So about how many do you recall 8 that he attended? 9 A. I don't know the exact figure, 10 but more often than not he was not there. 11 Q. Is there any other reason why 12 you're disappointed in Mr. Charles? 13 A. When he campaigned, I didn't -- 14 I do not recall seeing him when he was 15 campaigning, and so that was disappointing, 16 you know, to not see him out and about 17 campaigning. 18 Q. You live in Spring Valley, 19 right? 20 A. Yes. 21 Q. So you're saying you didn't see 22 Mr. Charles in Spring Valley? 23 A. Campaigning, I didn't see him 24 campaigning. 25 Q. Did you see him in Spring</p>	Page 75	<p>1 Dos Reis 2 Q. When you say he approached you, 3 was that in person? 4 A. Yes. 5 Q. Was it at a school board 6 meeting? 7 A. Yes. 8 Q. What did he say to you? 9 A. He wanted to know why I didn't 10 tell him that I was running. 11 Q. What did you say? 12 A. I told him that I didn't think I 13 had to tell anyone specifically. I just -- 14 I went to a forum and I announced my 15 candidacy at a forum where it was called for 16 and I didn't think I had to reach out to 17 people specifically and let them know I was 18 running. 19 Q. Why do you think he asked you 20 that? 21 MR. PEARCE: Objection. 22 MR. LEVINE: Okay, that's fine. 23 I'll ask it a different way. 24 Q. Was Mr. Charles interested in 25 supporting your campaign?</p>	Page 77

<p>1 Dos Reis 2 A. I think so. 3 Q. Did you talk with him further 4 about that? 5 A. No. 6 Q. Why not? 7 A. He was upset that I didn't tell 8 him that I was running, and so we just left 9 it at -- when I told him that I didn't think 10 I had to specifically reach out to anyone, 11 we left it at that. 12 Q. Did Mr. Charles want to help 13 you? 14 A. I don't know. 15 Q. Did you ever talk with him again 16 after that? 17 A. No. 18 Q. How long have you known him? 19 A. It's been a couple of years now. 20 Q. At any point in those few years 21 have you ever talked with him about school 22 district politics? 23 A. No. 24 Q. Do you think you could if you 25 wanted to?</p>	Page 78	<p>1 Dos Reis 2 Q. Could you tell him that? 3 MR. PEARCE: Objection. 4 A. I could. 5 Q. What about Pierre Germain, did 6 you ever try to tell him that you were 7 disappointed in him? 8 A. I did. 9 Q. When was that? 10 A. He approached me the same night 11 before Mr. Charles. 12 Q. At the same board meeting? 13 A. Yes. 14 Q. What did he say to you? 15 A. He was upset that I didn't tell 16 him I was running, but not as upset as 17 Mr. Charles. Mr. Charles was very upset. 18 Mr. Germain approached me about it, he was a 19 little upset, but then we talked it out. 20 Q. What did you talk about? 21 A. Well, he asked me why I didn't 22 tell him that I was running. And I said to 23 him the same thing, I didn't think I had to 24 let anyone specifically know. And he said 25 that he would have helped me. And I said to</p>	Page 80
<p>1 Dos Reis 2 A. Yes. 3 Q. Have you ever expressed to him 4 that you were disappointed in him as a 5 school board member? 6 A. I didn't express it to him 7 through words that I was disappointed. 8 Q. How did you express it to him? 9 A. I think that that was the 10 unsaid -- the unspoken truth between us when 11 he asked me why I didn't tell him I was 12 running. 13 Q. What do you mean by that? 14 A. Well, I didn't tell him that I 15 was running, I didn't reach out to him, 16 although every time we see each other, we'd 17 greet each other. I didn't tell him I was 18 running because I was disappointed in him 19 because I never see him at school board 20 meetings, and to me it's a let down. If 21 you're a somebody member, you should be at 22 the meeting. 23 Q. Why didn't you tell him that? 24 MR. PEARCE: Objection. 25 A. I don't know.</p>	Page 79	<p>1 Dos Reis 2 him that I didn't want to -- you know, I 3 just wanted to -- I wanted to kind of 4 just -- I put it out there that I was 5 running and I didn't think to go to anyone 6 specific. 7 Q. Did you tell Mr. Germain that 8 you didn't want his help? 9 A. No, just that I wasn't looking 10 for help from specific people. I just 11 wanted to put myself out there. And my 12 thing is I'm not a politician. I'm not -- 13 you know, I don't have any motivations for 14 running for school board aside from wanting 15 to bring positive change to the board, so 16 there was no need for me to look 17 specifically to people. 18 Q. What do you mean by that? 19 A. Well, when he said to me, why 20 didn't you come to me, I said, well, I 21 didn't think I had to. I mean, if -- 22 obviously if they wanted to support me once 23 they learned I was running, then they could 24 just support me by voting or telling other 25 people, you know, that I was running.</p>	Page 81

<p style="text-align: right;">Page 82</p> <p>1 Dos Reis 2 That's it. 3 Q. Pierre Germain has run two 4 successful campaigns for the school board, 5 right? 6 A. Yes. 7 Q. And he offered to help you in 8 your campaign, right? 9 A. Right, afterwards, uh-huh. 10 Q. Don't you think that would be 11 useful in running a successful campaign for 12 the school board? 13 A. Yes, like -- in the way that 14 you're saying it, yes. 15 Q. Mr. Charles has also run two 16 successful campaigns for the school board, 17 right? 18 A. Yes. 19 Q. And you think he wanted to help 20 you, right? 21 A. Perhaps. 22 Q. Don't you think that would have 23 been helpful also? 24 A. Yes. 25 Q. Why didn't you want their help?</p>	<p style="text-align: right;">Page 84</p> <p>1 Dos Reis 2 not his concern, some of the issues that we 3 have. 4 Q. What did you tell him about what 5 people are saying about him in the 6 community? 7 A. I told him that the people were 8 disappointed in him. 9 Q. Is that it? 10 A. Yeah, that they were 11 disappointed that he wasn't often at the 12 meetings and that he never said anything at 13 the meetings. 14 Q. Did people say anything else 15 about Pierre Germain in the community? 16 MR. PEARCE: Objection. 17 A. No. 18 Q. Why was Mr. Charles upset that 19 you didn't reach out to him? 20 MR. PEARCE: Objection. 21 A. I don't know. 22 Q. How upset was he? 23 A. Well, he came over to me and he 24 was upset and said to me that -- he 25 expressed that he was upset, and then the</p>
<p style="text-align: right;">Page 83</p> <p>1 Dos Reis 2 A. It's not that I didn't want 3 their help. If they wanted to help me, then 4 they could, but I didn't feel the need to 5 reach out specifically to anyone. 6 Q. But when they approached you at 7 the school board meeting, did you reject 8 their offers of help? 9 A. Well, Mr. Charles just expressed 10 that he was upset that I didn't tell him. 11 We didn't really discuss anything further. 12 And Mr. Pierre I said to him, if you want to 13 help me, by all means, spread the word, let 14 people know, and we left it at that. 15 Q. During that conversation you 16 told Mr. Germain you were disappointed in 17 his record as a school board member? 18 A. I asked him -- I told him what 19 the people were saying about him in the 20 community, and I asked him why he wasn't at 21 board meetings more often, and for him he 22 said that it wasn't his job to make change, 23 that that was on the superintendent. The 24 school board is just there to make sure that 25 the superintendent does their job, that it's</p>	<p style="text-align: right;">Page 85</p> <p>1 Dos Reis 2 conversation ended abruptly. 3 Q. How so? 4 A. In the sense that when I told 5 him I didn't think I had to reach out to 6 anyone specifically, he said, okay, and then 7 walked away. 8 Q. I mean, was that like a 9 conflict? 10 A. What do you mean? 11 Q. Like was it an uncomfortable 12 conversation? 13 A. No, I wasn't uncomfortable. 14 Q. What about your conversation 15 with Mr. Pierre? 16 A. No. 17 Q. Because you used the phrase 18 before that you talked it out. What did you 19 mean by that? 20 A. Yeah. Well, our conversation 21 didn't end abruptly when I told him that I 22 didn't think I needed to reach out to anyone 23 specifically. I told him how the community 24 was feeling about him. I expressed to him 25 that I was also disappointed that I didn't</p>

<p style="text-align: right;">Page 86</p> <p>1 Dos Reis 2 see him at meetings often, that he never 3 spoke out at the meetings. And he said what 4 he said about how it's not his job, and then 5 we left it at that. 6 Q. Is that a disagreement between 7 you and Mr. Germain? 8 A. Well, there is a difference of 9 opinion, but not a disagreement. 10 Q. Have you spoken with either of 11 them since that board meeting? 12 A. Yes. We all live in Spring 13 Valley, so we always say hello to each 14 other. 15 Q. Have you ever spoken with 16 Mr. Charles about the school district 17 specifically since then? 18 A. No. 19 Q. Have you ever spoken with 20 Mr. Germain about the school district since 21 then? 22 A. No. 23 Q. You haven't talked with either 24 of them about running for any other 25 political office?</p>	<p style="text-align: right;">Page 88</p> <p>1 Dos Reis 2 A. Right. No, we were not. 3 Q. Do you know why that is? 4 MR. PEARCE: Objection. 5 A. I don't know. 6 Q. Do you think -- how do I want to 7 say this? 8 Would you characterize East 9 Ramapo's electorate as being divided between 10 White private school community and the 11 public school community? 12 A. Yes. 13 Q. Do you know whether the White 14 private school community supported 15 Mr. Charles' bid for the school board? 16 A. With him, I don't know. 17 Q. Do you know whether the private 18 school community supported Mr. Germain's bid 19 for the school board? 20 A. Yes. 21 Q. Do you think that they might 22 have been able to help you campaign in that 23 community if you had asked them? 24 A. Yes. 25 Q. Do you think that you had to</p>
<p style="text-align: right;">Page 87</p> <p>1 Dos Reis 2 A. No. 3 Q. When you decided to run for 4 school board, did you reach out to anyone to 5 ask for help? 6 A. No. 7 Q. How did you obtain support from 8 Steve White? 9 A. Well, he's the gentleman who 10 sent out the call for candidates through 11 Power of Ten. 12 And so the process is you go -- 13 right, Power of Ten puts out and other 14 community leaders put information out to the 15 public that they're holding a candidates 16 forum. Those of us who are interested in 17 running present ourselves. And then some of 18 the community leaders come together and 19 they take the votes from the people from 20 that night, plus an interview that they do 21 with us, and then they decide what 22 candidates they're going to support, and 23 that's how the process works. 24 Q. You weren't successful in your 25 race for the school board, right?</p>	<p style="text-align: right;">Page 89</p> <p>1 Dos Reis 2 choose between Power of Ten on the one hand 3 and Mr. Charles and Mr. Germain on the 4 other? 5 A. No. 6 Q. So you could have gone to both? 7 A. Yes. 8 Q. Why didn't you? 9 A. Well, I didn't go to Power of 10 Ten. Like I said, Power of Ten puts out a 11 call for candidates, so it was an 12 opportunity for me to become a candidate, 13 and so that's why I ended up with the 14 support of Power of Ten and Strong East 15 Ramapo because they called for candidates. 16 Q. You could become a candidate 17 without Power of Ten, couldn't you? 18 A. Yes, but I didn't think of being 19 a candidate until I saw their call for 20 candidates. 21 Q. Did anything stop you from 22 asking Mr. Germain or Mr. Charles for help 23 once you became a candidate? 24 A. No. 25 Q. Do you know whether Power of Ten</p>

<p style="text-align: right;">Page 90</p> <p>1 Dos Reis 2 is popular in the private school community? 3 A. I don't know. 4 Q. Do you know whether any 5 candidate supported by Power of Ten has ever 6 won a majority of votes from the private 7 school community? 8 A. I don't know. I don't know. 9 Q. For your campaign, along with 10 your slate, did you have a vote turnout 11 program? 12 A. What do you -- 13 Q. By that I mean, did you have any 14 organized effort to get people to the polls 15 on election day? 16 A. Did we have an organized, setup 17 for getting people out to the polls? 18 Q. Um-hum. 19 A. Yes. 20 Q. Okay. If I call that a 21 "get-out-the-vote effort," would you know 22 what I mean? 23 A. Yes, that's exactly what it was. 24 Q. All right. What did you do? 25 A. We knocked on doors, we made</p>	<p style="text-align: right;">Page 92</p> <p>1 Dos Reis 2 door knocking and the phone calls was to 3 remind them that election day was happening. 4 That's what we wanted people to remember, 5 that there was an election happening on that 6 day. We did so by phone calls, door 7 knocking, like I said, flyers and offering 8 to take people to their polling sites. 9 Q. Do you know how many people you 10 reached with those efforts? 11 A. I don't know. 12 Q. Would you care to estimate? 13 A. No. 14 Q. Do you know whether Mr. Charles 15 has experience organizing get-out-the-vote 16 efforts? 17 A. I don't know. 18 Q. Do you know whether Mr. Germain 19 has experience with get-out-the-vote 20 efforts? 21 A. I don't know. 22 Q. Do you recall about how many 23 people showed up to the polls to vote for 24 your opponent on election day in 2017? 25 A. No. You mean how many people</p>
<p style="text-align: right;">Page 91</p> <p>1 Dos Reis 2 phone calls, we left flyers on windshields. 3 Q. What I mean specifically is like 4 on election day, did you have a program 5 where you offered people free rides to the 6 polls to vote? 7 A. Yes. 8 Q. Tell me about that; what was 9 that program? 10 A. Exactly what you said, that's 11 just offering free rides to the polls. 12 Q. Do you know how many people used 13 that service? 14 A. Yes. 15 Q. How many people? 16 A. Well, I don't have an exact 17 number, but roughly ten people had called 18 for the service and either utilized it or in 19 waiting ended up going a different route. 20 Q. Ten people? 21 A. Yeah. 22 Q. Any other efforts to get people 23 to the polls on election day? 24 A. That was our -- well, like I 25 said, and we used the other efforts as well,</p>	<p style="text-align: right;">Page 93</p> <p>1 Dos Reis 2 showed up to the polling sites? 3 Q. To vote for your opponent. 4 A. Only through the figures. 5 Q. Do you remember those? 6 A. I believe they had 9,000 votes. 7 Q. How many votes were cast for 8 your side of the slate? 9 A. Roughly about 4,800. 10 Q. Do you think in retrospect it 11 might have been helpful to have had some 12 help campaigning in the private school 13 community? 14 A. As I said earlier, we would have 15 liked to, and we kind of did through 16 Ms. Kressel and Ms. Shani, but people will 17 only vote for who they want to vote for. 18 Q. Do you know whether Ms. Kressel 19 or Ms. Shani have any experience in 20 politics? 21 A. Prior to me having met them, I 22 don't know. 23 Q. Do you know whether they have 24 any experience in managing a 25 get-out-the-vote effort?</p>

<p>1 Dos Reis 2 A. I don't know. 3 Q. Do you have any prior experience 4 in politics? 5 A. With politics, no. 6 Q. Do you think experience in 7 politics is important to run an effective 8 campaign? 9 A. Absolutely. It's part of it, 10 yes. It's part of it, a big part. 11 Q. Do you think your slate ran an 12 effective campaign? 13 A. Umm, I say we were effective in 14 the sense that we were able to raise the 15 number of votes in three particular polling 16 sites, which was something that -- you know, 17 that no one could have guessed, but we were 18 able to raise the amount of people who came 19 out and voted in three polling sites. So in 20 that sense, yes, we were effective. 21 Q. Mr. Charles is a Black man, 22 right? 23 A. Yes. 24 Q. When he was elected to the 25 board, he was elected with support from the</p>	Page 94	<p>1 Dos Reis 2 community prefers voting for White 3 candidates? 4 MR. PEARCE: Objection. 5 A. I don't know. 6 Q. Do you know what this case is 7 about? 8 A. Yes. 9 Q. What is this case about? 10 A. This case is about people of 11 color in East Ramapo feeling 12 underrepresented within the East Ramapo 13 school district in the sense of when it 14 comes to voting. 15 Q. Were you hindered in any way 16 from becoming a candidate for the board of 17 education? 18 A. No. 19 Q. Were people of color unable to 20 get to the polls on election day? 21 MR. PEARCE: Objection. 22 A. I can't speak for everyone. 23 Q. Are you aware of any people of 24 color who were somehow stopped from getting 25 to the polls on election day?</p>	Page 96
<p>1 Dos Reis 2 private school community, right? 3 A. From what I understand. 4 Q. Mr. Germain is a Black man too, 5 right? 6 A. Um-hum, yes. 7 Q. When he was elected, he was 8 elected with support from the private school 9 community, wasn't he? 10 A. That's what he told me. 11 Q. Do you recognize the name 12 MaraLuz Corado? 13 A. No. 14 Q. Do you recall a Latino woman 15 ever being elected to the school board? 16 A. A Latina woman? 17 Q. Um-hum. 18 A. No, not that I recall. 19 Q. Do you think that you lost the 20 election in 2017 because of your race? 21 A. Not because of my race, no. 22 Q. Why do you think you lost? 23 MR. PEARCE: Objection. 24 A. I don't know. 25 Q. Do you think that private school</p>	Page 95	<p>1 Dos Reis 2 A. I don't know. 3 Q. Without telling me anything 4 about anything you've ever spoken with your 5 counsel about, I'm not interested in that, 6 but when did you first agree to become a 7 plaintiff in this case? 8 A. It was about six months ago. 9 Q. Why did you agree to become a 10 plaintiff in this case? 11 A. Because I wanted to see a change 12 in our district for the better for everyone. 13 Q. What change? 14 A. In the last -- for some time 15 now, I can't say the exact number of years, 16 but for some time now public school parents 17 have not been able to successfully elect any 18 of their preferred candidates to the school 19 board, and it's frustrating because we don't 20 feel represented by the school board, by the 21 current school board, with the exception of 22 one person on the school board. 23 Q. Is Mr. Charles not a public 24 school parent? 25 A. He doesn't have children in the</p>	Page 97

<p>1 Dos Reis</p> <p>2 district, no.</p> <p>3 Q. How do you know that?</p> <p>4 A. I guess I just know.</p> <p>5 Q. Did you ever ask him?</p> <p>6 A. No.</p> <p>7 Q. Do you know where his kids went</p> <p>8 to school?</p> <p>9 A. I don't know where his kids went</p> <p>10 to school.</p> <p>11 Q. Would it surprise you to know</p> <p>12 that they went to public school?</p> <p>13 A. No.</p> <p>14 Q. Would that change your opinion</p> <p>15 about whether he's a public school parent?</p> <p>16 A. I mean, he could be a public</p> <p>17 school parent, but that doesn't mean he has</p> <p>18 their interests -- that he, you know, has</p> <p>19 their interests at heart.</p> <p>20 Q. Do you think Mr. Charles does</p> <p>21 not have the public school parents'</p> <p>22 interests at heart?</p> <p>23 A. To be honest, I don't know if he</p> <p>24 does.</p> <p>25 Q. Why not?</p>	<p>Page 98</p>	<p>1 Dos Reis</p> <p>2 doing.</p> <p>3 Q. Do you think public school</p> <p>4 parents are entitled to win elections?</p> <p>5 A. No, I wouldn't say they were</p> <p>6 entitled, no. No one is entitled.</p> <p>7 Q. Well, a candidate who wins the</p> <p>8 most votes is entitled to win the election,</p> <p>9 right?</p> <p>10 A. Yes.</p> <p>11 Q. And the candidate who doesn't</p> <p>12 win the most votes usually is not entitled</p> <p>13 to win the election, right?</p> <p>14 A. Yes.</p> <p>15 Q. Do you think that your election</p> <p>16 was unfair?</p> <p>17 A. Yes.</p> <p>18 Q. Why was it unfair?</p> <p>19 A. In our district we have both</p> <p>20 public school students and parents and we</p> <p>21 have private school students and parents,</p> <p>22 and I feel, and many of us feel, that the</p> <p>23 school board should be a reflection of the</p> <p>24 community, and currently there are more</p> <p>25 members of the board who are from the</p>	<p>Page 100</p>
<p>1 Dos Reis</p> <p>2 A. I guess part of the reason is,</p> <p>3 as you asked me, you know, why we never had</p> <p>4 conversations about the school board, you</p> <p>5 know, I'm a parent who's voiced concerns</p> <p>6 with the school board, and then I've seen</p> <p>7 him out and about in Spring Valley and he's</p> <p>8 never even approached me to say, you know,</p> <p>9 this is what the school board is trying to</p> <p>10 do, why -- I heard your concerns the other</p> <p>11 night and this what the school board is</p> <p>12 trying to do. Like he himself as a school</p> <p>13 board member has never reached out to me or</p> <p>14 anyone else that I know to say, listen, I've</p> <p>15 heard your concerns and this is what the</p> <p>16 school board is trying to do. I think that</p> <p>17 that's something that a school board member</p> <p>18 should do.</p> <p>19 Q. Have you ever told him that?</p> <p>20 A. No.</p> <p>21 Q. Do you think maybe you should?</p> <p>22 A. I don't think I should have to.</p> <p>23 When you -- you know, when you take on that</p> <p>24 task or that responsibility, you should</p> <p>25 already know what you're supposed to be</p>	<p>Page 99</p>	<p>1 Dos Reis</p> <p>2 private school community than public school</p> <p>3 community. That's why I feel that it was</p> <p>4 unfair.</p> <p>5 Q. When you say "the school board</p> <p>6 should be a reflection of the community,"</p> <p>7 which community?</p> <p>8 A. The entire East Ramapo school</p> <p>9 district.</p> <p>10 Q. Private school parents and</p> <p>11 public school parents?</p> <p>12 A. Yes.</p> <p>13 Q. I want to be clear, does that</p> <p>14 have anything to do with race?</p> <p>15 A. Well, we have Latinos, we have</p> <p>16 Black students, we have White students, so</p> <p>17 yes, the board should reflect that,</p> <p>18 absolutely.</p> <p>19 Q. There are three Black members of</p> <p>20 the school board right now, right?</p> <p>21 A. Yes.</p> <p>22 Q. There are six White members of</p> <p>23 the school board, right?</p> <p>24 A. Yes.</p> <p>25 Q. Is that not reflective of the</p>	<p>Page 101</p>

<p style="text-align: right;">Page 102</p> <p>1 Dos Reis 2 population of the community? 3 A. No, no. 4 Q. Why not? 5 A. There are no Latinos sitting on 6 the board. We do not have -- we don't have 7 any educators sitting on that board that I 8 know of. Mr. Pierre and Mr. Charles do not 9 currently have any children in school, in 10 the schools, and so it's really not -- you 11 know, we just don't feel that they represent 12 everyone. 13 Q. But isn't it a candidate's job 14 to persuade voters that they should be 15 elected so that they can represent the 16 community fairly? 17 A. Yes. 18 Q. Then why do you need this 19 lawsuit? 20 A. Because we need better 21 representation on the board. 22 Q. All right. But isn't it your 23 job to persuade voters that you need better 24 representation on the board? 25 A. Yes.</p>	<p style="text-align: right;">Page 104</p> <p>1 Dos Reis 2 community, right? 3 A. Yes. 4 Q. If Mr. Germain can do it and 5 he's a Black man, why couldn't you? 6 A. Because I don't know how he 7 obtained that support. 8 Q. He offered to help you? 9 A. Okay. Yes. 10 Q. You rejected him? 11 A. Well, I told him that I didn't 12 think that I needed to specifically ask 13 anyone for help. If you believe in what I'm 14 saying and my platform, then you come on and 15 vote. 16 Q. Do you think sometimes in 17 politics maybe you do need to ask people for 18 help? 19 A. I guess so. 20 Q. Right. 21 So there wasn't anything about 22 the way the district functions that stopped 23 you from getting support in the White 24 community, was there? 25 MS. CALABRESE: Objection.</p>
<p style="text-align: right;">Page 103</p> <p>1 Dos Reis 2 Q. So why do you need this lawsuit? 3 MR. PEARCE: Objection. 4 Q. Did anything stop you from 5 persuading voters of your position? 6 A. The only obstacle was the one 7 that I mentioned earlier about feeling not 8 welcome in certain communities, so then half 9 of the voting base was blocked off to us. 10 We couldn't, you know, get into, you know, 11 certain communities to speak because we were 12 told that we would not be well received. 13 Q. That didn't stop Bernard 14 Charles, did it? 15 MR. PEARCE: Objection. 16 A. I don't know. 17 Q. That didn't stop Pierre Germain, 18 did it? 19 MR. PEARCE: Objection. 20 A. I don't know. 21 Q. They offered to help you, didn't 22 they? 23 A. Mr. Pierre offered to help me. 24 Q. And Mr. Germain won his seat 25 with support from the private school</p>	<p style="text-align: right;">Page 105</p> <p>1 Dos Reis 2 A. Could you rephrase that? 3 Q. Yes. 4 The way elections are run in a 5 school district, that's not what stopped you 6 from getting support in the White community, 7 is it? 8 MR. PEARCE: Objection. 9 A. I don't -- I'm trying to -- 10 okay. East Ramapo is extremely diverse, 11 right, but we have pockets of areas that are 12 predominantly of a particular group of 13 people, and, you know, I believe in this 14 lawsuit for the purposes of being able to 15 get representation from -- for the entire 16 district. So there are nine seats on the 17 board, and if we could get nine people from 18 different areas of East Ramapo that are 19 willing to represent all of the children in 20 East Ramapo, I feel that that would be more 21 fair in our district. 22 Q. That would be more fair. Is the 23 current way elections are run unfair? 24 A. Yes. 25 Q. Why?</p>

<p style="text-align: right;">Page 106</p> <p>1 Dos Reis 2 A. Because the preferred candidates 3 of private school communities seem to be the 4 ones who are more often elected onto the 5 school board. 6 Q. Right. Because they get more 7 votes, right? 8 A. Yes. 9 Q. Why is that unfair? 10 A. The people in East Ramapo, 11 especially those from the public school 12 community, have very low morale at this 13 point because we've lost so many elections. 14 People don't feel that it's -- that their 15 vote counts, that it's going to make a 16 difference. And so because private 17 school -- the private school community 18 consistently is able to vote their 19 candidates in, it has changed the dynamic in 20 how people in the public school community -- 21 whether or not they come out and vote. 22 Q. Just so I'm clear, when you say 23 "public school community" in this context, 24 you mean just Black people? 25 A. No.</p>	<p style="text-align: right;">Page 108</p> <p>1 Dos Reis 2 parents do not feel represented by the 3 school board, and so when you're constantly 4 going up and you're speaking at school board 5 meetings and you're saying to the school 6 board why does my child not have a teacher 7 consistently, why do we lack substitutes, 8 why are our students being sent to the 9 cafeteria for whole periods, why don't we 10 have school trips, why are there wires 11 hanging from the ceiling, why are there 12 stairs falling apart, why do we have caution 13 tape all over the schools and outside, and 14 you don't get a response, not even so much 15 as the school board members even looking at 16 you when you're talking to them, it is 17 frustrating, and then what happens is people 18 walk away saying my vote, my voice doesn't 19 count. 20 Q. Let's see if we can sum this up. 21 Are elections in East Ramapo 22 driven by the race of the voters? 23 A. I don't know. 24 Q. What's the main thing in your 25 mind that determines how elections are going</p>
<p style="text-align: right;">Page 107</p> <p>1 Dos Reis 2 Q. Do you mean just Latino people? 3 A. No. 4 Q. Do you mean White people? 5 A. I mean the public school 6 community, which is a diverse community. 7 It's made up mostly, though, of people of 8 color. 9 Q. It's not defined by race, is it? 10 A. No. 11 Q. So the private school community 12 wins elections because they get more votes, 13 right? 14 A. That's how it would appear. 15 Q. Right. 16 And the public school community 17 losses elections because they get less 18 votes, right? 19 A. Yes. 20 Q. What's unfair about that? 21 A. What's unfair is that the public 22 school community feels beaten. They have 23 low morale based upon the fact that we do 24 consistently lose and don't -- and then 25 what's happening is that public school</p>	<p style="text-align: right;">Page 109</p> <p>1 Dos Reis 2 to come out in East Ramapo? 3 A. I don't know. 4 Q. Have you ever run for any other 5 political office? 6 A. I did after, after running for 7 school board. 8 Q. What office? 9 A. Village of trust -- trustee for 10 the village. 11 Q. The Village of Spring Valley? 12 A. Yes. 13 Q. Did you win? 14 A. No. 15 Q. How many votes did you get? 16 A. Honestly, I don't remember. 17 Q. Do you know how many other 18 people were running for the same position? 19 A. There were about eight of us 20 running. Um-hum. 21 Q. Do you recall how you placed 22 among the candidates? 23 A. What do you mean? 24 Q. Number 2, Number 4? 25 A. I don't recall exactly how they</p>

<p>1 Dos Reis 2 questions for you. 3 Have you ever made any sort of 4 appeal or complaint to the New York State 5 Education Department? 6 A. I'm sorry, what was the first 7 thing you said? 8 Q. Like an appeal or a complaint of 9 some sort. 10 A. Yes, we did. 11 Q. What was the nature of that 12 appeal or complaint -- first of all, was it 13 an appeal or a complaint? 14 A. It was a letter that was sent to 15 Commissioner Elia just stating what the 16 frustrations were of many of the parents in 17 East Ramapo. 18 Q. And did you write that letter? 19 A. I did not write it. 20 Q. Who wrote that letter? 21 A. You know, I'm not sure if it was 22 Mr. White or Mr. Mandel. 23 Q. Mr. Steve White, is that the 24 person you're referring to? 25 A. Steve White is the person -- is</p>	Page 114	<p>1 Dos Reis 2 commissioner or to someone else? 3 A. No, there was one specifically 4 to the commissioner. 5 Q. What were the contents of the 6 letter, anything that you could remember? 7 A. To the commissioner, it had to 8 do with -- it was two different events that 9 took place. That letter was the -- that 10 first one, if I recall carefully, was about 11 transportation. It was about 12 transportation. 13 Q. What kind of transportation? 14 A. From what we understood, the 15 school board -- some of the school board 16 members wanted to add non-mandated busing 17 days, which would have cost the district 18 millions of dollars. 19 Q. Did the letter deal with any 20 other issues that you recall? 21 A. The transportation was the main 22 issue. 23 Q. Do you know if that letter had 24 anything to do with board elections that we 25 were talking about before?</p>	Page 116
<p>1 Dos Reis 2 one of our community leaders, and Andrew 3 Mandel also. 4 Q. Andrew Mandel. Is it 5 M-A-N-D-E-L? 6 A. M-A-N-D-E-L. 7 Q. When was this letter written, if 8 you know, approximately? 9 A. I believe it was in April of 10 2017. 11 Q. And how were you affiliated with 12 the letter; did you sign the letter or you 13 just read it? 14 A. With that letter, we reached out 15 to her on two separate occasions that I can 16 remember. I believe with the letter, I 17 don't think -- not that I physically signed 18 it, but that I agreed to having read it and 19 that I agreed with the statement. 20 Q. And did an organization send 21 that letter to you? 22 A. It would have been Strong East 23 Ramapo. 24 Q. And is it your understanding 25 that that letter was directed to the</p>	Page 115	<p>1 Dos Reis 2 A. I don't think so, not with board 3 elections, not that one. 4 Q. And then I think you said there 5 was a second letter? 6 A. We did have a second issue, but 7 I wasn't a part of that one, not -- yeah, 8 not as I was with the first one. 9 Q. Do you remember anything else 10 about that other letter? 11 A. About the second letter? The 12 first time was about -- it was a concern 13 about the addition of non-mandated busing 14 days. And in the second time, a letter was 15 sent, but I don't believe -- I'm not sure if 16 it was sent to Commissioner Elia or someone 17 else; however, it had to do with 18 Commissioner Elia coming down and having a 19 meeting in private with some of the school 20 board members and agreeing to having the 21 non-mandated busing days. So really that 22 was the issue, but it was dealt with on two 23 separate occasions. 24 Q. So both letters dealt with this 25 transportation issue?</p>	Page 117

<p>1 Dos Reis 2 A. Mr. Sipple and -- I forgot. 3 Hold on. I see his name. Szuberla. 4 Szuberla and Sipple. 5 Q. Is there anything else you 6 recall about the transportation issue 7 besides the two letters and the meeting we 8 talked about with respect to the 9 commissioner? 10 A. No. To the commissioner, no. 11 Q. So beyond those two letters and 12 the meetings, do you recall any other 13 appeals or complaints to the State Education 14 Department that you have made personally? 15 A. No. Me personally, no. I've 16 signed off on other things that came around. 17 Q. What kind of things? 18 A. Like when we requested the state 19 monitors, they sent out like petitions for 20 the state monitor, I signed off on that. 21 Q. Okay. So not a petition where a 22 lot of people have signed off on something, 23 but a letter you've written or appeal you've 24 filed or a complaint or something like that, 25 do you recall any other times?</p>	<p>Page 122</p> <p>1 Dos Reis 2 asked any questions. 3 MR. PEARCE: Yes. 4 MS. CALABRESE: But you said you 5 were done, Randy. You guys need to 6 communicate better. 7 MR. LEVINE: That's interesting. 8 MS. CALABRESE: Do you want to 9 pull out the rules? 10 MR. LEVINE: Are you going to 11 instruct your witness not to answer? 12 MS. CALABRESE: Yes, because you 13 already said you were done with her. 14 MR. LEVINE: Okay. Let's note 15 for the record that the deposition is 16 ongoing, the State has asked 17 questions, I would like to redirect, I 18 have questions for the witness, and 19 witness's counsel is going to direct 20 the witness not to answer them. So 21 I'll ask my questions, you can direct 22 her not to answer them. 23 MS. CALABRESE: Can we take a 24 break here so that Tom and I can talk? 25 MR. LEVINE: If you would like.</p>
<p>1 Dos Reis 2 A. No. 3 Q. Do you recall any appeals or 4 complaints to the State Education Department 5 specifically around the issue of the board's 6 election or about voting systems or anything 7 like that? 8 A. No. 9 MS. MATTHEWS: Thank you. 10 That's all of I have. 11 MR. LEVINE: I have two 12 questions. 13 MS. CALABRESE: You don't get to 14 do more questions. 15 MR. LEVINE: Why not? 16 THE WITNESS: Because you said 17 you were done. 18 MS. CALABRESE: Yeah, you said 19 you were done. 20 MR. LEVINE: No, I get to do a 21 redirect. 22 MS. CALABRESE: No. You're both 23 on the same time. If we were to ask 24 questions, then you can cross -- yes, 25 you can cross again, but we haven't</p>	<p>Page 123</p> <p>1 Dos Reis 2 MS. CALABRESE: I would like. 3 MR. LEVINE: Okay. Five-minute 4 break. 5 (Recess taken.) 6 MS. CALABRESE: We object to the 7 district asking any further questions. 8 We believe it is outside the scope of 9 the rules and that the district 10 already rested and that it is not 11 permitted to ask questions even though 12 the defendant commissioner had further 13 questions, but we are going to permit 14 the witness to answer questions so 15 that we can hopefully spare any return 16 of the witness, but we object to any 17 questions going forward. 18 To the extent that the district 19 has any further questions, at the very 20 least they should be limited to the 21 scope of the commissioner's questions, 22 but we object to any questions 23 happening at all. 24 MR. LEVINE: Objection noted. 25 //</p>

<p style="text-align: right;">Page 126</p> <p>1 Dos Reis 2 EXAMINATION BY (CONT'D) 3 MR. LEVINE: 4 Q. Just a few more questions. 5 Earlier in the deposition I 6 specifically asked you if you thought that 7 the school district was spending too much 8 money on busing for private school students; 9 do you remember that? 10 A. Yes. 11 Q. Do you remember how you 12 answered? 13 A. Right, I said -- I think I said 14 no. 15 Q. Right. 16 So the State just asked you a 17 question about whether you had sent any 18 letters or signed onto any letters to the 19 commissioner and you specifically mentioned 20 one where you were objecting to a policy of 21 the school district to provide non-mandated 22 busing to private schools, right? 23 A. They wanted additional. Not 24 that they -- not that they wanted it period, 25 but that they wanted -- they already have</p>	<p style="text-align: right;">Page 128</p> <p>1 Dos Reis 2 A. They sent the letter objecting 3 to additional non-mandating busing. 4 Q. Isn't that a policy position? 5 A. I didn't think it was. 6 Q. Are there any other positions 7 like that objecting to a specific thing that 8 the district does or wants to do from Strong 9 East Ramapo? 10 A. Not that I can recall. 11 MS. CALABRESE: Objection. 12 Q. Do you know what I mean when I 13 say "policy"?</p> <p>14 A. When you say "policy," my 15 thought is something like almost like a law 16 to be enacted.</p> <p>17 Q. Assume when I say "policy," I 18 mean anything the school district does, 19 okay?</p> <p>20 A. Oh, okay.</p> <p>21 MR. PEARCE: Objection.</p> <p>22 Q. Does Strong East Ramapo take 23 positions on any school district policies?</p> <p>24 A. Does Strong East Ramapo take a 25 position on anything the school board does;</p>
<p style="text-align: right;">Page 127</p> <p>1 Dos Reis 2 non-mandated busing. They wanted additional 3 non-mandated busing. 4 Q. Are they providing that 5 additional non-mandated busing now? 6 A. No. It was voted down by the 7 people. 8 Q. By what people? 9 A. Everyone. It was put -- 10 Q. What people? 11 A. East Ramapo school district. 12 Q. Like in the budget vote? 13 A. Yes. 14 Q. So another question that I asked 15 you related to whether Strong East Ramapo 16 takes positions on district policies? 17 A. Um-hum. 18 Q. Do you remember how you answered 19 that question? 20 A. Right. I said, no. 21 Q. Right. 22 Didn't you just testify that 23 Strong East Ramapo sent a letter to the 24 commissioner objecting to the proposed 25 non-mandated busing policy?</p>	<p style="text-align: right;">Page 129</p> <p>1 Dos Reis 2 is that correct, is that what you're asking? 3 Q. Yes. 4 A. On anything that the school 5 board does? 6 Q. Yes. 7 A. Well, I'm not sure if this is 8 what you mean, but I objected to -- and I 9 voiced that objection in the school board 10 meeting -- about hiring a bus company that 11 was known for violations. Is that what you 12 mean? 13 Q. I -- 14 A. But that was me like personally. 15 So other than that, I really haven't -- and 16 that I know of with Strong East Ramapo, no. 17 Q. Do you remember earlier when I 18 asked if the board had done anything that 19 you might have done differently? 20 MS. CALABRESE: No. This is 21 outside the scope of the cross. 22 MR. LEVINE: No, it's not, 23 because we're talking about 24 non-mandated busing. 25 Are you instructing your witness</p>

<p style="text-align: right;">Page 130</p> <p>1 Dos Reis 2 not to answer? 3 MS. CALABRESE: Your question 4 was not -- 5 MR. LEVINE: Are you instructing 6 your witness not to answer? 7 MS. CALABRESE: Would you like 8 to rephrase your question so that it 9 actually refers to transportation? 10 MR. LEVINE: My question -- are 11 you finished, by the way? 12 Q. My question is: Do you recall 13 when I asked you if the board had done 14 anything that you would do differently, do 15 you remember what you said? 16 A. I believe I said, no. 17 Q. Right. What about this issue 18 with the contractor that you just described 19 involving the busing, wasn't that something? 20 A. Well, they hadn't done it. They 21 put it out there for people to vote on to 22 say how -- it was something that they were 23 considering, but they hadn't actually done 24 it. 25 Q. Have they done it since then?</p>	<p style="text-align: right;">Page 132</p> <p>1 Dos Reis 2 forth in one of the meetings that they were 3 considering this particular transportation 4 company, and so then we have the right to 5 speak in the beginning of meetings and state 6 any concerns that we have. And a lot of 7 people stated their concerns with this 8 transportation -- with this transportation 9 company because of violations that that 10 company had had where they put children's 11 lives at risk. 12 So it may not necessarily be -- 13 it could be that maybe they did more 14 homework on it and then decided that it 15 wasn't in the best interests of all the 16 children. 17 Q. But it didn't go forward, right? 18 A. It didn't go forward, right. 19 Q. You opposed a proposal to add 20 non-mandated busing days for private school 21 students, right? 22 A. Say that again. 23 Q. You opposed a proposal to add 24 non-mandated busing days for private school 25 students, right?</p>
<p style="text-align: right;">Page 131</p> <p>1 Dos Reis 2 A. No, because they considered it, 3 they put it out there, the people said they 4 didn't want it, and so then they didn't do 5 it. 6 Q. So would you say the board was 7 responsive to the people's concerns? 8 A. In that particular instance. 9 Then again, we really don't know, because 10 there were other issues with that 11 transportation that, you know -- there were 12 other issues that came up, the fact that 13 they had numerous violations and had been 14 dropped by other companies, so it could be 15 because of their track record that they 16 decided not to go with them. 17 Q. Didn't you say that this 18 decision was put out to a vote? 19 A. Not to a vote, but it is that 20 the school board has to discuss, you know, 21 what they're going to vote on, and when they 22 put it out that they were considering -- 23 they didn't even put it out there. Let me 24 think. 25 Yes, it was put out, it was put</p>	<p style="text-align: right;">Page 133</p> <p>1 Dos Reis 2 A. Yes. Additional, yes. 3 Q. Who proposed that? 4 A. The school board. 5 Q. Do you know who on the school 6 board? 7 A. Specifically, no. 8 Q. Do you know who voted for that 9 proposal? 10 A. No. 11 Q. Do you know who supported that 12 proposal? 13 A. No. 14 Q. Do you know if the private 15 school community supported that proposal? 16 A. At board meetings that I 17 attended there were private school parents 18 who came forward and stated that they were 19 in support of the non-mandated -- the 20 additional non-mandated busing. 21 Q. You disagreed with them, right? 22 A. Well, I disagreed with the 23 additional days, yes. 24 Q. Did you speak at board meetings 25 saying you disagreed with the additional</p>

<p style="text-align: right;">Page 134</p> <p>1 Dos Reis 2 non-mandated busing? 3 A. I don't remember exactly. I 4 spoke twice in front of the school board. 5 One in particular was about the 6 transportation company that they wanted. 7 And the second time I don't recall 8 everything that I -- I don't recall what I 9 said exactly, what I was, you know, speaking 10 to the board about. 11 Q. Was non-mandated busing one of 12 the things? 13 A. Yes. That was -- no. Not that, 14 I'm sorry. I thought you were going to say 15 the transportation company. No, I don't 16 remember. 17 Q. Do you remember any of the 18 things that you said? 19 A. In the second time, no. 20 Q. Is there any other issue like 21 the non-mandated busing that was supported 22 by private school parents that you disagreed 23 with? 24 (**DI)MS. CALABRESE: Objection. 25 That's outside the scope of the cross,</p>	<p style="text-align: right;">Page 136</p> <p>1 Dos Reis 2 Q. The election was in May of 2017, 3 right? 4 A. Yes. 5 Q. So this happened right before 6 the election, didn't it? 7 A. Yes. 8 Q. Was this non-mandated busing 9 days issue covered in the press? 10 A. I don't recall. 11 Q. Was this non-mandated busing 12 issue well known in the public school 13 community, for example? 14 MR. PEARCE: Objection. 15 A. I don't know. 16 Q. Was this non-mandated busing 17 issue important to the private school 18 community? 19 MR. PEARCE: Objection. 20 A. I don't know how important. 21 Q. Do you think that the additional 22 days of non-mandated busing would have 23 benefited private school parents? 24 A. I don't know. But the reason 25 why we disagreed with it was because it was</p>
<p style="text-align: right;">Page 135</p> <p>1 Dos Reis 2 and yes, I'm going to instruct my 3 witness not to answer, and you can 4 call the magistrate. 5 MR. LEVINE: Are you going to 6 instruct her not to answer anymore 7 question or just that question? 8 (**DI)MS. CALABRESE: That one. 9 If you want to stick to the scope of 10 the cross, which is the letter sent to 11 the commissioner, then by all means go 12 ahead, but we're getting way beyond 13 that now, and I let it go for a while, 14 but now I'm not. 15 MR. LEVINE: We will go ahead 16 and put that on the record. 17 Q. So the question was, was there 18 anything else like the non-mandated busing 19 proposal that the private school parents 20 supported, but that you disagreed with? 21 (**DI)MS. CALABRESE: Chevron, 22 don't answer the question. 23 Q. When was this debate over 24 additional non-mandated busing days? 25 A. Between March and April of 2017.</p>	<p style="text-align: right;">Page 137</p> <p>1 Dos Reis 2 put out there right before the election and 3 we just wanted more time to consider 4 everything. 5 Q. So are you saying you didn't 6 oppose additional non-mandated busing? 7 A. What we did was we said that it 8 was too close to the election to put 9 something like that out there. 10 Q. Would the additional 11 non-mandated busing have resulted in more 12 cost to the school district? 13 A. Yes. That was in addition. 14 Q. Would those costs have to be 15 included in the budget? 16 A. Yes. 17 Q. Does the budgets have to be 18 approved by the voters on election day? 19 A. Yes. 20 Q. Would delaying until after the 21 election have prevented the school district 22 from adding additional non-mandated busing 23 until the next year? 24 MR. PEARCE: Objection. 25 MS. CALABRESE: Objection.</p>

<p style="text-align: right;">Page 138</p> <p>1 Dos Reis 2 A. I don't know. 3 Q. How much would the additional 4 days of non-mandated busing have cost? 5 MR. PEARCE: Objection. 6 A. I don't remember. 7 Q. Did you oppose the proposed 8 additional days of non-mandated busing 9 because of the expense? 10 A. That was one of the reasons, 11 yes. 12 Q. What were the other reasons? 13 A. Because it was too close to the 14 election for people to really be able to 15 think about it and talk about it and then to 16 make a sound decision on it. 17 Q. Any other reasons? 18 A. No. 19 Q. Was there something more you 20 needed to know about the proposed additional 21 non-mandated busing to make up your mind? 22 A. Yes. 23 Q. What? 24 A. How it was going to affect 25 everyone else, everyone, everyone in East</p>	<p style="text-align: right;">Page 140</p> <p>1 Dos Reis 2 Q. Did the proposal to add 3 additional non-mandated busing for private 4 school students make you angry? 5 A. Not angry, but I was concerned, 6 like why are you bringing something up right 7 before the election that if it passes is 8 going to cost money that no one can answer 9 as to where it was going to come from. 10 Q. So was there a difference of 11 interests between the private school 12 community and the public school community 13 over this non-mandated busing issue? 14 A. It's not a difference of 15 interest. It was just a concern as to where 16 that money was going to come from when we're 17 already stretched way too thin. 18 Q. Is that because you think there 19 is only enough money to go for one or the 20 other? 21 MR. PEARCE: Objection. 22 A. Not at all. 23 Q. Did you talk with anybody on the 24 school board directly about the non-mandated 25 busing?</p>
<p style="text-align: right;">Page 139</p> <p>1 Dos Reis 2 Ramapo. 3 Q. I don't understand. What do you 4 mean by that? 5 A. We've lost a lot of services and 6 we've lost a lot of teachers in the last 7 couple of years, a lot, to the point where 8 our students are sent to sit in a cafeteria 9 for a whole period because we're missing 10 teachers and we lack substitutes. There's a 11 lot that our children are not getting now. 12 And the excuse is because there's no money 13 for it. 14 So if there's no money for 15 teachers and for substitutes and for 16 services, then to ask for additional 17 non-mandated busing days, that needed to be 18 discussed and it needed to be -- it needed 19 to be looked at very carefully because where 20 was that money going to come from. If we 21 already -- the board is claiming we don't 22 have money, so then where was the money 23 going to come from for non-mandated busing. 24 That was the question. And nobody could 25 answer that. That was an issue.</p>	<p style="text-align: right;">Page 141</p> <p>1 Dos Reis 2 A. Directly, no. 3 Q. Indirectly? 4 MR. PEARCE: Objection. 5 A. With the school board, no. 6 Q. So you didn't talk to 7 Mr. Charles about non-mandated busing? 8 A. No. 9 Q. You didn't talk to Mr. Germain 10 about non-mandated busing? 11 A. No. 12 Q. What happened to the 13 non-mandated busing proposal? 14 A. They put it on the budget -- 15 they put it as an option in the budget 16 voting. 17 Q. What happened in the budget? 18 A. It was voted down. 19 Q. Was there -- 20 A. It was voted down, by the way, 21 by both the private and the public 22 communities. 23 Q. Really? 24 A. Yes. 25 Q. By majorities of both</p>

<p>1 Dos Reis 2 communities? 3 A. I don't know. 4 Q. That's interesting. Why do you 5 think that is? 6 MR. PEARCE: Objection. 7 A. I don't know. 8 Q. Was it because of the 9 non-mandated budget proposal? 10 A. I don't know. 11 Q. Was a budget proposed for a 12 revote, like a new budget? 13 A. Yes, they had to put forth 14 another budget, um-hum. 15 Q. Did it include the non-mandated 16 busing proposal? 17 (Continued on following page.) 18 19 20 21 22 23 24 25</p>	Page 142	<p>1 2 C E R T I F I C A T E 3 STATE OF NEW YORK) 4 : ss. 5 COUNTY OF NEW YORK) 6 I, THERESA TRAMONDO, a Notary 7 Public within and for the State of New 8 York, do hereby certify: 9 That Chevon Dos Reis, the witness 10 whose deposition is hereinbefore set 11 forth, was duly sworn by me and that such 12 deposition is a true record of the 13 testimony given by the witness. 14 I further certify that I am not 15 related to any of the parties to this 16 action by blood or marriage, and that I am 17 in no way interested in the outcome of 18 this matter. 19 IN WITNESS WHEREOF, I have 20 hereunto set my hand this 19th day of 21 February, 2018. 22 <i>Theresa Tramondo</i> 23 24 THERESA TRAMONDO 25</p>	Page 144
<p>1 Dos Reis 2 A. The second time around? No, I 3 don't believe so, no. 4 MR. LEVINE: All right. No 5 further questions. 6 MR. PEARCE: No questions on our 7 side. 8 (Time noted: 3:27 p.m.) 9 10 CHEVON DOS REIS 11 12 Subscribed and sworn to before me 13 this ____ day of _____, 201_. 14 15 16 Notary Public 17 18 19 20 21 22 23 24 25</p>	Page 143	<p>1 2 ----- I N D E X ----- 3 WITNESS EXAMINATION BY PAGE 4 C. DOS REIS MR. LEVINE 5/126 5 MS. MATTHEWS 113 6 ----- INFORMATION REQUESTS ----- 7 DIRECTIONS: 134, 135, 135 8 RULINGS: (NONE) 9 TO BE FURNISHED: (NONE) 10 REQUESTS: (NONE) 11 MOTIONS: (NONE) 12 CONFIDENTIAL: (NONE) 13 ----- EXHIBITS ----- 14 DOS REIS FOR ID. 15 16 Dos Reis Exhibit 1, document, 11 17 declaration of Chevon Dos Reis 18 (EXHIBITS RETAINED BY REPORTER.) 19 20 21 22 23 24 25</p>	Page 145

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1
2 ERRATA SHEET
3 VERITEXT LEGAL SOLUTIONS
4 1801 MARKET STREET, 18TH FLOOR
5 PHILADELPHIA, PENNSYLVANIA 19103
6 800.727.6396

7 NAME OF CASE: NAACP VS. ERCS, ET AL.
8 5 DATE OF DEPOSITION: FEBRUARY 7, 2018
9 NAME OF WITNESS: CHEVON DOS REIS

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22 23 (Notary Public) My Commission Expires:
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[& - answer]

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